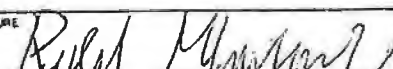


Court of Common Pleas of Philadelphia County  
Trial Division  
Civil Cover Sheet

For Prothonotary Use Only (Check Number)

JUNE 2019

005311

|   |  |   |   |
|---|--|---|---|
| PLAINTIFF'S NAME<br><b>Kristen Behrens, Esq., as Administratrix of the Estates, et al</b>   |  | DEFENDANT'S NAME<br><b>Arconic, Inc., et al</b>   |   |
| PLAINTIFF'S ADDRESS<br>1500 Market Street, Suite 3500E<br>Philadelphia, PA 19102  |  | DEFENDANT'S ADDRESS<br>201 Isabella Street<br>Pittsburgh, PA 15212  |   |
| PLAINTIFF'S NAME<br>See Attached Sheet for List of Plaintiffs   |  | DEFENDANT'S NAME<br>See Attached Sheet for List of Defendants   |   |
| PLAINTIFF'S ADDRESS   |  | DEFENDANT'S ADDRESS   |   |
| PLAINTIFF'S NAME  |  | DEFENDANT'S NAME  |   |
| PLAINTIFF'S ADDRESS   |  | DEFENDANT'S ADDRESS   |   |
| TOTAL NUMBER OF PLAINTIFFS<br><b>247</b>  | TOTAL NO. OF DEFENDANTS<br><b>5</b>  | COMMITMENT OF ACTION<br><input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal<br><input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions |   |
| AMOUNT IN CONTROVERSY<br><input type="checkbox"/> \$50,000.00 or less<br><input checked="" type="checkbox"/> More than \$50,000.00                      | COURT PROGRAMS<br><input checked="" type="checkbox"/> Arbitration<br><input type="checkbox"/> Jury<br><input type="checkbox"/> Non-Jury<br><input type="checkbox"/> Other: | <input type="checkbox"/> Mass Tort<br><input type="checkbox"/> Savings Action<br><input type="checkbox"/> Petition  | <input type="checkbox"/> Minor Court Appeal<br><input type="checkbox"/> Statutory Appeals<br><input type="checkbox"/> Commerce (Completion of Addendum Required)<br><input type="checkbox"/> Settlement<br><input type="checkbox"/> Minors<br><input type="checkbox"/> W/D/Survival |
| CASE TYPE AND CODE (SEE INSTRUCTIONS)<br><br>2P Product Liability   |  |   |   |
| STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)  |  |   |   |
| RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)<br><br><b>NONE</b>   |  |   | IS CASE SUBJECT TO COORDINATION ORDER?<br>Yes    No<br><input type="checkbox"/> <input type="checkbox"/><br><input type="checkbox"/> <input type="checkbox"/><br><input type="checkbox"/> <input type="checkbox"/>  |
| TO THE PROTHONOTARY:<br>Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant:<br>Papers may be served at the address set forth below. |  |   |   |
| NAME OF PLAINTIFFS/PETITIONER/APPELLANT'S ATTORNEY<br>Robert J. Mongoluzzi, Esquire/Jeffrey P. Goodman, Esquire/Samuel B. Dordick, Esquire              |  | ADDRESS (SEE INSTRUCTIONS)<br>Satz, Mongoluzzi, Barrell & Bendesky, P.C.<br>52nd Floor, 1850 Market Street<br>Philadelphia, PA 19103  |   |
| PHONE NUMBER<br>215-496-8282  | FAX NUMBER<br>215-496-0989   |   |   |
| SUPREME COURT IDENTIFICATION NO.<br>36283/308433/322847   |  | E-MAIL ADDRESS<br>mongoluzzi@smbb.com; jgoodman@smbb.com; sdordick@smbb.com   |   |
| SIGNATURE<br>  |  | DATE<br>08/06/2019  |   |

## Instructions for Completing Civil Cover Sheet

Rules of Court require that a Civil Cover Sheet be attached to any document commencing an action (whether the action is commenced by Complaint, Writ of Summons, Notice of Appeal, or by Petition). The information requested is necessary to allow the Court to properly monitor, control and dispose cases filed. A copy of the Civil Cover Sheet must be attached to service copies of the document commencing an action. The attorney or non-represented party filing a case shall complete the form as follows:

### A. Parties

#### i. Plaintiffs/Defendants

Enter names (last, first, middle initial) of plaintiff, petitioner or appellant ("plaintiff") and defendant. If the plaintiff or defendant is a government agency or corporation, use the full name of the agency or corporation. In the event there are more than three plaintiffs and/or three defendants, list the additional parties on the Supplemental Parties Form. Husband and wife are to be listed as separate parties.

#### ii. Parties' Addresses

Enter the address of the parties at the time of filing of the action. If any party is a corporation, enter the address of the registered office of the corporation.

#### iii. Number of Plaintiffs/Defendants: Indicate the total number of plaintiffs and total number of defendants in the action.

### B. Commencement Type: Indicate type of document filed to commence the action.

### C. Amount in Controversy: Check the appropriate box.

### D. Court Program: Check the appropriate box.

### E. Case Types: Insert the code number and type of action by consulting the list set forth hereunder. To perfect a jury trial, the appropriate fees must be paid as provided by rules of court.

#### Proceedings Commenced by Appeal

##### Minor Court

- 3M Money Judgment
- 5L Landlord and Tenant
- 5D Denial Open Default Judgment
- 5E Code Enforcement
- Other:

##### Local Agency

- 5B Motor Vehicle Suspension - Breathalyzer
- 5V Motor Vehicle Licenses, Inspections, Insurance
- 5C Civil Service
- 5K Philadelphia Parking Authority
- 5Q Liquor Control Board
- 5R Board of Revision of Taxes
- 5X Tax Assessment Boards
- 5Z Zoning Board
- 52 Board of View
- 51 Other:

##### Other:

#### Proceedings Commenced by Petition

- 8P Appointment of Arbitrators
- 8C Name Change - Adult
- 8L Compel Medical Examination
- 8D Eminent Domain
- 8E Election Matters
- 8F Forfeiture
- 8S Leave to Issue Subpoena
- 8M Mental Health Proceedings
- 8Q Civil Tax Case - Petition
- Other:

#### Actions Commenced by Writ of Summons or Complaint

##### Contract

- 1C Contract
- 1T Construction
- 1O Other:

##### Tort

- 2B Assault and Battery
- 2L Libel and Slander
- 4F Fraud
- 1J Bad Faith
- 2E Wrongful Use of Civil Process
- Other:

##### Negligence

- 2V Motor Vehicle Accident
- 2H Other Traffic Accident
- 1F No Fault Benefits
- 4M Motor Vehicle Property Damage
- 2F Personal Injury - FELA
- 2O Other Personal Injury
- 2S Premises Liability - Slip & Fall
- 2P Product Liability
- 2T Toxic Tort
- T1 Asbestos
- TZ DES
- T2 Implant
- 3E Toxic Waste
- Other:

##### Professional Malpractice

- 2D Dental
- 4L Legal
- 2M Medical
- 4Y Other:

##### IG Subrogation

##### Equity

- E1 No Real Estate
- E2 Real Estate
- 1D Declaratory Judgment
- M1 Mandamus

##### Real Property

- 3R Rent, Lease, Ejectment
- Q1 Quiet Title
- 3D Mortgage Foreclosure - Residential Owner Occupied
- 3F Mortgage Foreclosure - Not Residential Not Owner Occupied
- 1L Mechanics Lien
- P1 Partition
- Prevent Waste
- 1V Replevin
- 1H Civil Tax Case - Complaint
- Other:

### F. Commerce Program

Commencing January 3, 2000 the First Judicial District instituted a Commerce Program for cases involving corporations and corporate law issues, in general. If the action involves corporations as litigants or is deemed a Commerce Program case for other reasons, please check this block AND complete the information on the "Commerce Program Addendum". For further instructions, see Civil Trial Division Administrative Docket 01 of 2000.

### G. Statutory Basis for Cause of Action

If the action is commenced pursuant to statutory authority ("Petition Action"), the specific statute must be identified.

### H. Related Pending Cases

All previously filed related cases, regardless of whether consolidated by Order of Court or Stipulation, must be identified.

### I. Plaintiff's Attorney

The name of plaintiff's attorney must be inserted herein together with other required information. In the event the filer is not represented by an attorney, the name of the filer, address, the phone number and signature is required.

The current version of the Civil Cover Sheet may be downloaded from the FJD's website  
<http://courts.phila.gov>



**SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.**

BY: ROBERT J. MONGELUZZI/JEFFREY P. GOODMAN/

SAMUEL B. DORDICK

IDENTIFICATION NO.: 36283/309433/322647

1650 MARKET STREET

52ND FLOOR

PHILADELPHIA, PA 19103

(215) 496-8282

**DiCELLO LEVITT GUTZLER LLC**

BY: MARK A. DiCELLO

IDENTIFICATION NO.: 326629

7556 MENTOR AVENUE

WESTERN RESERVE

LAW BUILDING

MENTOR, OH 44060

(440) 953-8888

*Attorneys for Plaintiffs*

**KRISTEN BEHRENS, ESQUIRE as  
Administratrix of the ESTATES OF:**

**GLORIA TREVISAN;**

**FATEMEH AFRASEHABI;**

**SAKINA AFRASEHABI;**

**AMAL AHMEDIN;**

**AMAYA AHMEDIN;**

**MOHAMMAD ALHAJALI;**

**ALEXANDRA ATALA;**

**HUSNA BEGUM;**

**LEENA BELKADI;**

**MALAK BELKADI;**

**OMAR BELKADI;**

**RAYMOND BERNARD;**

**VINCENT CHIEJINA;**

**BASSEM CHOUCAIR;**

**FATIMA CHOUCAIR;**

**MIERNA CHOUCAIR;**

**NADIA CHOUCAIR;**

**SIRRIA CHOUCAIR;**

**ZEINAB CHOUCAIR;**

**JOSEPH DANIELS;**

**JEREMIAH DEEN;**

**ZAINAB DEEN;**

**ANTHONY DISSON;**

**ESLAH ELGWAHRY;**

**PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
LAW DIVISION**

**JUNE TERM, 2019**

**NO. 005311**

**JURY TRIAL DEMANDED**

**MARIEM ELGWAHRY;  
FATHIA AHMED ELSANOUSI;  
ABDUL AZIZ EL-WAHABI;  
FAOUZIA EL-WAHABI;  
MEHDI EL-WAHABI;  
NUR HUDA EL-WAHABI;  
YASIN EL-WAHABI;  
LOGAN GOMES;  
MARCO GOTTARDI;  
BERKTI HAFTOM;  
BIRUK HAFTOM;  
FARAH HAMDAN;  
MOHAMMED HAMID;  
MOHAMMED HANIF;  
YAHYA HASHIM;  
FIRDAWS HASHIM;  
HASHIM KEDIR;  
YAQUB HASHIM;  
FETHIA HASSAN;  
HANIA HASSAN;  
ABUFARS IBRAHIM;  
ISRA IBRAHIM;  
RANIA IBRAHIM;  
AMNA MAHMUD IDRIS;  
ALI YAWAR JAFARI;  
NURA JEMAL;  
HAMID KANI;  
KHADIJA KHALLOUFI;  
VICTORIA KING;  
DEBORAH LAMPRELL;  
GARY MAUNDERS;  
MARY MENDY;  
KAMRU MIAH;  
LIGAYA MOORE;  
DENIS MURPHY;  
MOHAMED AMIED NEDA;  
ISAAC PAULOS;  
MARIA DEL PILAR BURTON;  
STEVEN POWER;  
JESSICA URBANO RAMIREZ;  
KHADIJA SAYE;  
SHEILA SMITH;  
MOHAMEDNUR TUCCU;  
ERNIE VITAL; and  
MARJORIE VITAL**

1500 Market Street, Suite 3500E

Philadelphia, PA 19102

*And*

**AHMED ABDEL-RASOUL**  
[REDACTED]

*And*

**MUSTAFA ABDU**  
[REDACTED]

*And*

**SABAH ABDULLAH**  
[REDACTED]

*And*

**ABDUL-WAHAB ABDULHAMID and  
MARYAM ADAM h/w**  
[REDACTED]

*And*

**ABRAHAM ABEBE and TURUFAT  
YILMA GIRMA, h/w INDIVIDUALLY  
AND AS PARENTS AND NATURAL  
GUARDIANS OF** [REDACTED]  
[REDACTED]

*And*

**KAREN ABOUD, INDIVIDUALLY AND  
AS PARENT AND NATURAL GUARDIAN  
OF** [REDACTED] **and** [REDACTED]  
[REDACTED]

*And*

**ELSA AFEWORKI**

[REDACTED]

*And*

**MOHAMED AHMED and RANDA AL-  
ARASI, h/w, INDIVIDUALLY AND AS  
PARENTS AND NATURAL GUARDIANS  
OF [REDACTED] and [REDACTED]**

[REDACTED]

*And*

**FADUMO AHMED**

[REDACTED]

*And*

**KHALID AHMED**

[REDACTED]

*And*

**OMAR ALHAJ ALI**

[REDACTED]

*And*

**MARIA DE FATIMA ALVES and  
MANUEL MIGUEL ALVES, h/w**

[REDACTED]

*And*

**INES TAVARES ALVES**

[REDACTED]

*And*

**TIAGO ALVES**

[REDACTED]

*And*

**MERON ARAYA**

[REDACTED]

*And*

**ETHIOPIA ASSEFA**

[REDACTED]

*And*

**SIED BAYAN and NADIA YOUSEF, h/w**

[REDACTED]

*And*

**JOHN BEADLE**

[REDACTED]

*And*

**SAFA HAMDAN, AS LEGAL GUARDIAN  
OF**

[REDACTED]

*And*

**ELPIDIO BONIFACIO and ROSITA  
BONIFACIO, h/w**

[REDACTED]

*And*

**NICHOLAS BURTON**

[REDACTED]

*And*

**VIRGILIO CASTRO**

[REDACTED]

*And*

**ANN CHANCE**

[REDACTED]

*And*

**LEE CHAPMAN and CHIA-YUAN  
NAOMI LI, h/w**

[REDACTED]

*And*

**SALAH EDDINE CHEBIOUNI**

[REDACTED]

*And*

**ZAK CHEBIOUNI**

[REDACTED]

*And*

**FUNG-HEE CHEUNG**

[REDACTED]

*And*

**CHIN-HSUAN LYDIA LIAO**

[REDACTED]

[REDACTED]

*And*

**JOSE COSTA COTELO and DORINDA  
SUAREZ CHANS, h/w**

[REDACTED]

*And*

**KATARZYNA DABROWSKA and ROY  
SMITH, h/w, INDIVIDUALLY AND AS  
PARENTS AND NATURAL GUARDIANS  
OF [REDACTED] and [REDACTED]**

[REDACTED]

*And*

**EDWARD DAFFARN**

[REDACTED]

*And*

**SAM DANIELS**

[REDACTED]

*And*

**HIWOT DAGNACHEW and WINTOM  
TEMESGEN, h/w, INDIVIDUALLY AND  
AS PARENTS AND NATURAL  
GUARDIANS OF [REDACTED] AND**

[REDACTED]

*And*

**ALEMISHET DEMISSIE**

[REDACTED]

*And*

**PETRA DOULOVA and LEROY  
AUGUSTUS, h/w**

[REDACTED]

*And*

**BELLAL EL-GUENUNI and RABIA  
YAHYA, h/w, INDIVIDUALLY AND AS  
PARENTS AND NATURAL GUARDIANS  
OF**

[REDACTED]  
[REDACTED], and [REDACTED]  
[REDACTED]

*And*

**HANAN WAHABI, INDIVIDUALLY AND  
AS PARENT AND NATURAL GUARDIAN  
OF**

[REDACTED]  
[REDACTED]

*And*

**MOUNA EL-OGBANI and YOUSSEF  
KHALLOUD, h/w, INDIVIDUALLY AND  
AS PARENTS AND NATURAL  
GUARDIANS OF**

[REDACTED], and [REDACTED]  
[REDACTED]  
[REDACTED]

*And*

**NATASHA ELCOCK, INDIVIDUALLY  
AND AS PARENT AND NATURAL  
GUARDIAN OF**

[REDACTED]  
[REDACTED]  
[REDACTED]



*And*

**YEHUALASHET ENYEW**  
[REDACTED]

*And*

**RICHARD FLETCHER and HIME  
GASHAW, h/w, INDIVIDUALLY AND AS  
PARENTS AND NATURAL GUARDIANS  
OF [REDACTED]**  
[REDACTED]

*And*

**HELEN GEBREMESKEL,  
INDIVIDUALLY AND AS PARENT AND  
NATURAL GUARDIAN OF [REDACTED]**  
[REDACTED]

*And*

**CLARITA GHAVIMI**  
[REDACTED]

*And*

**MARCIO GOMES, INDIVIDUALLY AND  
AS PARENTS AND NATURAL  
GUARDIANS OF [REDACTED] and**  
[REDACTED]

*And*

**ANDREIA PERESTRELO**  
[REDACTED]

*And*

**CHARMAINE GREENRIDGE**

[REDACTED]

*And*

**DANIEL GRIFFIN**

[REDACTED]

*And*

**SHARON HALEY**

[REDACTED]

*And*

**LINA HAMIDE**

[REDACTED]

*And*

**WILLIAM THOMSON and MARY  
HANLEY, h/w**

[REDACTED]

*And*

**CATHERINE HANLEY**

[REDACTED]

*And*

**AVNI HAXHISEFA**

[REDACTED]

*And*

**ADRIANA ZYMBERAJ, INDIVIDUALLY**

**AND AS PARENT AND NATURAL  
GUARDIAN OF** [REDACTED]  
[REDACTED]

*And*

**ALK HAXHISEFA**  
[REDACTED]  
[REDACTED]

*And*

**MAKREM HARZI and RAWDA SAID,  
h/w, INDIVIDUALLY AND AS PARENTS  
AND NATURAL GUARDIANS OF** [REDACTED]  
[REDACTED]  
[REDACTED]

*And*

**ABDIRAHMAN SALAH HIRSI**  
[REDACTED]  
[REDACTED]

*And*

**SUHAYB SALAH HIRSI**  
[REDACTED]  
[REDACTED]

*And*

**VAN QUANG HO**  
[REDACTED]  
[REDACTED]

*And*

**HOANG KHANH QUANG**  
[REDACTED]  
[REDACTED]

*And*

**EDUARDO IGNACIO and ERLINDA  
IGNACIO, h/w**

[REDACTED]

*And*

**WESLEY IGNACIO and MADYLYN  
IGNACIO, h/w, INDIVIDUALLY AND AS  
PARENTS AND NATURAL GUARDIANS  
OF**

[REDACTED]

*And*

**NADIA JAFARI**

[REDACTED]

*And*

**FATIMA JAFARI**

[REDACTED]

*And*

**MARIA JAFARI**

[REDACTED]

*And*

**JOSEPH JOHN, INDIVIDUALLY AND AS  
PARENT AND NATURAL GUARDIAN  
FOR**

[REDACTED]

*And*

**CORINNE JONES, INDIVIDUALLY AND  
AS PARENT AND NATURAL GUARDIAN  
OF**

[REDACTED] **and** [REDACTED]  
[REDACTED]

[REDACTED]

*And*

**BEHAILU GOBENA KEBEDE**

[REDACTED]

*And*

**FARSHID KAFICHERAGHI**

[REDACTED]

*And*

**MILAD KAREEM**

[REDACTED]

*And*

**BETTY KASOTE**

[REDACTED]

*And*

**MESROB KASSEMDJIAN**

[REDACTED]

*And*

**SHARON LACI, INDIVIDUALLY AND AS  
PARENT AND NATURAL GUARDIAN  
OF**

[REDACTED]

*And*

**MONICA LOKKO**

[REDACTED]

*And*

**DAVID LEWIS**  
[REDACTED]

*And*

**OCTINIA LEWIS**  
[REDACTED]

*And*

**MIRAN LOVSIN and SUZANA LOVSIN,**  
**h/w**  
[REDACTED]

*And*

**BRANISLAV LUKIC**  
[REDACTED]

*And*

**HANIFE MACIT and SENER MACIT, h/w**  
[REDACTED]

*And*

**MOHAMMED RASOUL and MUNIRA**  
**MAHMUD, h/w, INDIVIDUALLY AND AS**  
**PARENTS AND NATURAL GUARDIANS**  
**OF** [REDACTED]  
**and** [REDACTED]

*And*

**SEPIDEH MINAEI MOGHADDAM**  
[REDACTED]

*And*

**AMINA MOHAMED**

[REDACTED]

*And*

**AMNA MOHAMED**

[REDACTED]

*And*

**ALISON MOSES**

[REDACTED]

*And*

**NAGAWA PROSSY NALUKWAGO**

[REDACTED]

*And*

**RESHAD NAQSHBANDI**

[REDACTED]

*And*

**FARHAD SHEKEB NEDA**

[REDACTED]

*And*

**SHAKILA FLORA NEDA**

[REDACTED]

*And*

**EMMA O'CONNOR**

[REDACTED]

*And*

**KERRY O'HARA**

[REDACTED]

*And*

**GITARA PAHLAVANI**

[REDACTED]

*And*

**MICHAEL PARAMASIVAN**

[REDACTED]

*And*

**CHIRAAG PATEL**

[REDACTED]

*And*

**SHANTILAL PATEL and KIRAN PATEL,  
h/w**

[REDACTED]

*And*

**ELISA RABAYA**

[REDACTED]

*And*

**AZIZA RAIHANI**

[REDACTED]



*And*

**RAMIRO URBANO RODRIGUEZ and  
ADRIANA RAMIREZ, h/w**

[REDACTED]

*And*

**RHEA ROJO**

[REDACTED]

*And*

**ANTONIO RONCOLATO**

[REDACTED]

*And*

**REBECCA ROSS**

[REDACTED]

*And*

**REBIN SABIR**

[REDACTED]

*And*

**GENET SHAWO and PAULOS TEKLE,  
h/w**

[REDACTED]

*And*

**ANTHONY SMITH**

[REDACTED]

*And*

**ELIZABETH SOBIESZCZAK and  
MICHAEL SOBIESZCZAK, h/w**

[REDACTED]

*And*

**FLORENTYNA SOBIESZCZAK**

[REDACTED]

*And*

**ADAM SUPAREOGSANOND**

[REDACTED]

*And*

**CHALALAI SUPAROEKSANOND**

[REDACTED]

*And*

**WAEWTA SUPAREOGSANOND**

[REDACTED]

*And*

**RITA TANKARIAN**

[REDACTED]

*And*

**LUKE TOWNER**

[REDACTED]

*And*

**MARIKO TOYOSHIMA-LEWIS,  
INDIVIDUALLY AND AS PARENT AND**

**NATURAL GUARDIAN OF** [REDACTED]

, AND [REDACTED]

*And*

**CARMEN VIEIRO and JOSE VIEIRO, h/w**  
[REDACTED]

*And*

**YOHANNES TESFAY and MERON  
MEKONNEN, h/w, INDIVIDUALLY AND  
AS PARENTS AND NATURAL  
GUARDIANS OF** [REDACTED] **and**  
[REDACTED]

*And*

**EAMON ZADA**  
[REDACTED]

***Plaintiffs***

**v.**

**ARCONIC, INC.**  
201 Isabella St.  
Pittsburgh, PA 15212

*And*

**ALCOA INC.**  
201 Isabella St.  
Pittsburgh, PA 15212

*And*

**ARCONIC ARCHITECTURAL**

**PRODUCTS, LLC**  
201 Isabella St.  
Pittsburgh, PA 15212

*And*

**WHIRLPOOL CORPORATION**  
2000 N. M-63  
Benton Harbor, MI 49022

*And*

**SAINT-GOBAIN CORPORATION d/b/a  
SAINT-GOBAIN NORTH AMERICAN  
and/or d/b/a CELOTEX**  
20 Moores Road  
Malvern, PA 19355

*And*

**JOHN DOES (1-99)**

*And*

**ABC CORPORATIONS (1-99)**

*And*

**XYZ CORPORATIONS (1-99)**

***Defendants***

**"NOTICE**

"You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

"YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS

**"AVISO**

"Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las páginas siguientes, tiene veinte (20) días, a partir de recibir esta demanda y la notificación para entablar personalmente o por un abogado una comparecencia escrita y también para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE

|   |  |
|---|--|
| <p><u>AT A REDUCED FEE OR NO FEE.</u></p> <p>PHILADELPHIA BAR ASSOCIATION<br/>LAWYER REFERRAL and INFORMATION SERVICE<br/>One Reading Center<br/>Philadelphia, Pennsylvania 19107<br/>(215) 238-1701"</p> | <p><u>CONTRATAR A UN ABOGADO. SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.</u></p> <p>ASOCIACION DE LICENCIADOS DE FILADELFIA<br/>SERVICO DE REFERENCA E INFORMACION LEGAL<br/>One Reading Center<br/>Filadelfia, Pennsylvania 19107<br/>Telefono: (215) 238-1701"</p> |
|---|--|

## **COMPLAINT – CIVIL ACTION (PRODUCTS LIABILITY)**

### **INTRODUCTION**

1. On June 14, 2017, seventy-two (72) people were senselessly killed when a fire ripped through Grenfell Tower, a high rise apartment building in West London.
2. The fire, which started in a refrigerator, migrated through Flat 16 in the Grenfell Tower and eventually reached the building's exterior cladding.
3. Once the fire reached the building's exterior cladding, it relentlessly raced up the sides of the building engulfing it in flames.
4. The highly flammable cladding turned Grenfell Tower into a flaming coffin, entrapping the residents and their guests and sentencing the victims to agonizing and painful deaths by burning and suffocation.
5. In addition to the senseless deaths, scores of residents and guests at the Tower suffered life altering physical, emotional and psychological injuries.
6. The devastating fire began when a Whirlpool fridge-freezer, model number FF175BP (hereinafter referred to as the "Whirlpool Fridge-Freezer"), malfunctioned causing its plastic backing to ignite.
7. The fire was dramatically exacerbated by the tower's external cladding, the exposed core of which was polyethylene, a highly flammable and combustible material.

8. The highly combustible cladding encasing the entirety of the Tower caused the fire to spread rapidly until the fire quickly became uncontrollable.

9. The cladding was designed, manufactured, conceived and/or sold by Defendant Arconic, Inc. and/or its predecessor corporation Alcoa, Inc. and/or Arconic Architectural Products, LLC and/or their subsidiaries, sister corporations, predecessor entities, and/or successor entities (collectively referred to as the “Arconic” unless otherwise indicated) and sold under the trade name/label “Reynobond PE”.

10. Arconic is an iconic Pennsylvania Corporation which was founded in 1888 as the Pittsburgh Reduction Company.

11. Arconic’s nucleus of operations has remained in Pennsylvania since its founding over 100 years ago.

12. Due to its highly flammable nature, Reynobond PE cannot be sold or fit for high rise buildings in the United States, and Arconic therefore determined to exploit the European market and export the danger abroad that they couldn’t sell at home.

13. Through its behavior, Arconic sent the message that foreign lives are worth less than American lives and that it is acceptable to expose people outside the United States to dangers to which people in the United States would not be exposed.

14. Arconic’s behavior has left a black eye on the proud face of the Pennsylvania products designing and manufacturing industry.

15. The Arconic Defendants’ corporate greed and desire to cut corners and save money culminated in the conscious, knowing and reckless decision to supply the cheaper and highly flammable Reynobond polyethylene cladding (hereinafter referred to as “Reynobond PE”) instead of the more expensive Reynobond Fire Resistant cladding (hereinafter referred to as

“Reynobond FR”) to Grenfell Tower, despite knowing that the Reynobond PE cladding was unfit for the Tower.

**16.** The conflagration was further contributed to by the highly combustible Insulation used in Grenfell tower’s external cladding.

**17.** This cladding was designed and manufactured by another Pennsylvania entity, Celotex Corporation, which through various corporate renamings and mergers is today known as Saint-Gobain Corporation d/b/a Saint-Gobain North America and/or d/b/a Celotex (hereinafter “Celotex”).

**18.** Defendant Celotex knew that its insulation was highly combustible and was not fit or suitable for use in external cladding for buildings, but knowingly sold and supplied it to the Tower anyway.

**19.** Worse, Celotex fraudulently manipulated test results to hide the flammable nature of their insulation from consumers.

**20.** Celotex too, through their conduct has brought shame on the Commonwealth of Pennsylvania and its proud manufacturing and designing industries.

**21.** Almost two years of investigation have revealed the unambiguous truth that the tragedy which took the lives of 72 innocent victims and ruined hundreds more was inflicted upon the population of Grenfell by United States corporations and their defiance of safety.

**22.** As a result of this tragedy, Plaintiffs bring this action seeking compensatory and punitive damages from the United States based corporations whose defective products caused this tragedy.

23. Specifically, Plaintiffs file this action sounding in product liability action against corporations who designed, manufactured, and sold the defective products which caused this tragedy.

24. Plaintiffs are not asserting any claims for negligence but instead are solely seeking recovery based on the applicable product liability laws and the applicable laws regarding punitive damages.

25. Through this action, Plaintiffs assert all available damages under Pennsylvania law for claims sounding in Products Liability and punitive damages aimed at deterring future corporations from behaving in such an irresponsible manner in the future.

#### **THE PLAINTIFFS**

26. Kristen Behrens, Esquire, is an adult citizen of the Commonwealth of Pennsylvania and licensed Pennsylvania attorney with a principal business address of 1500 Market Street, Suite 3500E, Philadelphia, PA 19102.

27. As demonstrated by the documents attached hereto as "Exhibit A", Plaintiff, Kristen Behrens has been appointed by the Philadelphia Register of Wills to serve as the Administratrix of the Estates of:

- a. Gloria Trevisan;
- b. Fatemeh Afrasehabi;
- c. Sakina Afrasehabi;
- d. Amal Ahmedin;
- e. Amaya Ahmedin;
- f. Mohammad Alhajali;
- g. Alexaandra Atala;



- h. Husna Begum;
- i. Leena Belkadi;
- j. Malak Belkadi;
- k. Omar Belkadi;
- l. Raymond Bernard;
- m. Vincent Chiejina;
- n. Bassem Choukair;
- o. Fatima Choucair;
- p. Mierna Choucair;
- q. Nadia Choucair;
- r. Sirria Choucair;
- s. Zeinab Choucair;
- t. Joseph Daniels;
- u. Jeremiah Deen;
- v. Zainab Deen;
- w. Anthony Disson;
- x. Eslah Elgwahry;
- y. Mariem Elgwahry;
- z. Fathia Ahmed Elsanousi;
- aa. Abdulaziz El-Wahabi;
- bb. Faouzia El-Wahabi;
- cc. Mehdi El-Wahabi;
- dd. Nurhuda El-Wahabi;

ee. Yasin El-Wahabi;  
ff. Logan Gomes;  
gg. Marco Gottardi;  
hh. Berkti Haftom;  
ii. Biruk Haftom;  
jj. Farrah Hamdan;  
kk. Mohammed Hamid;  
ll. Mohammed Hanif;  
mm. Yahya Hashim;  
nn. Firdaws Hashim;  
oo. Kedir Hashim;  
pp. Yaqub Hashim;  
qq. Fethia Hassan;  
rr. Hania Hassan;  
ss. Abufars Ibrahim;  
tt. Isra Ibrahim;  
uu. Rania Ibrahim;  
vv. Amna Mahmud Idris;  
ww. Al Yawar Jafari;  
xx. Nura Jemal;  
yy. Hamid Kani;  
zz. Khadija Khalloufi;  
aaa. Victoria King;

bbb. Deborah Lamprell;  
ccc. Gary Maunders;  
ddd. Mary Mendy;  
eee. Kamru Miah;  
fff. Ligaya Moore;  
ggg. Denis Murphy;  
hhh. Mohamed Amied Neda;  
iii. Isaac Paulos;  
jjj. Maria del Pilar Burton;  
kkk. Steven Power;  
lll. Jessica Urbano Ramirez;  
mmm. Khadija Saye;  
nnn. Sheila Smith;  
ooo. Mohamednur Tuccu;  
ppp. Ernie Vital; and  
qqq. Marjorie Vital.

See Letters of Administration, attached hereto as **Exhibit "A"**.

**28.** Claims are brought on behalf of each Estate listed above on behalf of the Estate and on behalf of and for the benefit of all beneficiaries.

**29.** Plaintiff, Ahmed Abdel-Rasoul, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**30.** Plaintiff, Mustafa Abdu, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

31. Plaintiff, Sabah Abdullah, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

32. Plaintiffs, Abdul-Wahab Abdulhamid and Maryam Adam, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

33. Plaintiffs, Abraham Abebe and Turufat Yilma Girma, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, and who also resides at the above-captioned address.

34. Plaintiff, Elsa Afeworki, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

35. Plaintiffs, Shahid Ahmed and Sayeda Ahmed, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

36. Plaintiff, Karen Aboud, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom, who also reside at the above-captioned address.

37. Plaintiffs, Mohammed Ahmed and Randa Al-Arasi, h/w, are adult individuals and citizens of the United Kingdom, residing at the above captioned address, and are the parents and natural guardians of minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom and who also reside at the above-captioned address.

38. Plaintiff, Fadumo Ahmed, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

39. Plaintiff, Khalid Ahmed, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

40. Plaintiff, Omar Alhaj Ali, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

41. Plaintiffs, Maria de Fatima Alves and Manuel Miguel Alves, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

42. Plaintiff, Ines Tavares Alves, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

43. Plaintiff, Tiago Alves, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

44. Plaintiff, Meron Araya, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

45. Plaintiff, Ethiopia Assefa, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

46. Plaintiffs, Sied Bayan and Nadia Yousef, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

47. Plaintiff, John Beadle, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

48. Plaintiff, Safa Hamdan, is an adult individual and citizen of the United Kingdom, and is the Legal Guardian of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, residing at the above-captioned address.

49. Plaintiffs, Elpidio Bonifacio and Rosita Bonifacio, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**50.** Plaintiff, Nicholas Burton, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**51.** Plaintiff, Virgilio Castro, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**52.** Plaintiff, Ann Chance, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**53.** Plaintiffs, Lee Chapman and Chia-Yuan Naomi Li, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**54.** Plaintiff, Salah Eddine Chebiouni, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**55.** Plaintiff, Zak Chebiouni, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**56.** Plaintiff, Fung-Hee Cheung, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**57.** Plaintiff, Chin-Hsuan Lydia Liao, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**58.** Plaintiffs, Jose Costa Coteló and Dorinda Suarez Chans, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**59.** Plaintiffs, Katarzyna Dabrowska and Roy Smith, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom and also reside at the above-captioned address.

60. Plaintiff, Edward Daffarn, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

61. Plaintiff, Sam Daniels, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

62. Plaintiffs, Hiwot Dagnachew and Wintom Temesgen, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of Minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom, who also reside at the above-captioned address.

63. Plaintiff, Alemishet Demissie, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

64. Plaintiffs Petra Doulova and Leroy Augustus, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

65. Plaintiffs, Bellal El-Guenuni and Rabia Yahya, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of minor Plaintiffs, [REDACTED], [REDACTED], [REDACTED], and [REDACTED], who are individuals and citizens of the United Kingdom and also reside at the above-captioned address.

66. Plaintiff, Hanan Wahabi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Minor Plaintiff [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

67. Plaintiffs, Mouna El-Ogbani and Youssef Khalloud, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and

Natural Guardians of minor Plaintiffs, [REDACTED], [REDACTED], and [REDACTED], who are individuals and citizens of the United Kingdom and who also reside at the above-captioned address.

68. Plaintiff, Natasha Elcock, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address and is the Parent and Natural Guardian of minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

69. Plaintiff, Yehualashet Enyew, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

70. Plaintiffs, Richard Fletcher and Hime Gashaw, h/w, are individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, and who also resides at the above-captioned address.

71. Plaintiff, Helen Gebremeskel, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Lulya Benyam, who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

72. Plaintiff, Clarita Ghavimi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

73. Plaintiff, Marcio Gomes, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Luana Gomes, and Megan Gomes.



74. Plaintiff, Andreia Perestrelo, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

75. Plaintiff, Charmaine Greenridge, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

76. Plaintiff, Daniel Griffin, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

77. Plaintiff, Sharon Haley, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

78. Plaintiff, Lina Hamide, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

79. Plaintiffs, William Thomson and Mary Hanley, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

80. Plaintiff, Catherine Hanley, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

81. Plaintiff, Avni Haxhisefa, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

82. Plaintiff, Adriana Zymberaj, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

83. Plaintiff, Alk Haxhisefa, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

84. Plaintiffs, Makrem Harzi and Rawda Said, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are Parents and Natural Guardians of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

85. Plaintiff, Abdirahman Salah Hirsi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

86. Plaintiff, Suhayb Salah Hirsi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

87. Plaintiff, Van Quang Ho, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

88. Plaintiff, Hoang Khanh Quang, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

89. Plaintiffs, Eduardo Ignacio and Erlinda Ignacio, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

90. Plaintiffs, Wesley Ignacio and Madylyn Ignacio, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of minor Plaintiff, [REDACTED] who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

91. Plaintiff, Nadia Jafari, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

92. Plaintiff, Fatima Jafari, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

93. Plaintiff, Maria Jafari, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

94. Plaintiff, Joseph John, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Minor Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

95. Plaintiff, Corrine Jones, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom, who also resides at the above-captioned address.

96. Plaintiff, Behailu Gobena Kebede, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

97. Plaintiff, Farshid Kaficheraghi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

98. Plaintiff, Milad Kareem, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

99. Plaintiff, Betty Kasote, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

100. Plaintiff, Mesrob Kassemajian, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

101. Plaintiff, Sharon Laci, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address, and is the Parent and Natural Guardian of Minor

Plaintiff, [REDACTED], who is an individual and citizen of the United Kingdom, who also resides at the above-captioned address.

102. Plaintiff, Monica Lokko, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

103. Plaintiff, David Lewis, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

104. Plaintiff, Octinia Lewis, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

105. Plaintiffs, Miran Lovsin and Suzana Lovsin, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

106. Plaintiff, Branislav Lukic, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

107. Plaintiffs, Hanife Macit and Sener Macit, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

108. Plaintiffs, Mohammed Rasoul and Munira Mahmud, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom, who also reside at the above-captioned address.

109. Plaintiff, Sepideh Minaei Moghaddam, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

110. Plaintiff, Amina Mohamed, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**111.** Plaintiff, Amna Mohamed, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**112.** Plaintiff, Alison Moses, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**113.** Plaintiff, Nagawa Prossy Nalukwago, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**114.** Plaintiff, Reshad Naqshbandi, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**115.** Plaintiff, Farhad Shekeb Neda, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**116.** Plaintiff, Shakila Flora Neda, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**117.** Plaintiff, Emma O'Connor, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**118.** Plaintiff, Kerry O'Hara, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**119.** Plaintiff, Gitara Pahlavani, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**120.** Plaintiff, Michael Paramasivan, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**121.** Plaintiff, Chiraag Patel, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**122.** Plaintiffs, Shantilal Patel and Kiran Patel, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**123.** Plaintiff, Elisa Rabaya, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**124.** Plaintiff, Aziza Raihani, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**125.** Plaintiffs, Ramiro Urbano Rodriguez and Adriana Ramirez, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**126.** Plaintiff, Rhea Rojo, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**127.** Plaintiff, Antonio Roncolato, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**128.** Plaintiff, Rebecca Ross, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**129.** Plaintiff, Rebin Sabir, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**130.** Plaintiffs, Genet Shawo and Paulos Tekle, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

**131.** Plaintiff, Anthony Smith, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

**132.** Plaintiffs, Elizabeth Sobieszczak and Michael Sobieszczak, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

133. Plaintiff, Florentyna Sobieszczak, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

134. Plaintiff, Adam Supareogsanond, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

135. Plaintiff, Chalalai Supareoksanond, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

136. Plaintiff, Waewta Supareogsanond, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

137. Plaintiff, Rita Tankarian, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

138. Plaintiff, Luke Towner, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

139. Plaintiff, Mariko Toyoshima-Lewis, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address and is the Parent and Natural Guardian of Minor Plaintiffs, [REDACTED], [REDACTED], and [REDACTED], who are individuals and citizens of the United Kingdom, who also reside at the above-captioned address.

140. Plaintiffs, Carmen Vieiro and Jose Vieiro, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address.

141. Plaintiffs, Tesfaye Yohannes and Meron Mekonnen, h/w, are adult individuals and citizens of the United Kingdom, residing at the above-captioned address, and are the Parents and Natural Guardians of minor Plaintiffs, [REDACTED] and [REDACTED], who are individuals and citizens of the United Kingdom, who also reside at the above-captioned address.

142. Plaintiff, Eamon Zada, is an adult individual and citizen of the United Kingdom, residing at the above-captioned address.

### **THE DEFENDANTS**

143. The Arconic Defendants have been deeply entrenched in Pennsylvania history for over 130 years, dating back to the incorporation of the Arconic Defendants' original predecessor, the Pittsburgh Reduction Company, in 1888.

144. The Pittsburgh Reduction Company first opened its doors in Pittsburgh, Pennsylvania, and through each successor corporation has headquartered its global operations from Pittsburgh, Pennsylvania.

145. The Arconic Defendants' original predecessor, the Pittsburgh Reduction Company renamed itself as the Aluminum Company of America in 1907, and continued to orchestrate the entirety of its operations from Pittsburgh, Pennsylvania.

146. In 1999, the Arconic Defendants' predecessor, the Aluminum Company of America, again renamed itself as Alcoa.

147. Alcoa continued to maintain its headquarters and its center of global operations in Pittsburgh, Pennsylvania.

148. The Arconic Defendants launched their first line of Reynobond products from their headquarters in Pittsburgh, Pennsylvania in 2011.

149. In 2016, the Arconic Defendants' immediate predecessor, Alcoa, launched Arconic as a standalone company, continuing to design, engineer, fabricate, market, sell, distribute, and/or supply Reynobond products from their headquarters in Pittsburgh, Pennsylvania.



**150.** The Arconic Defendants' century-plus of corporate operations, continuously headquartered in Pittsburgh, Pennsylvania, culminated in the intentional, knowing, and reckless decision to supply the subject Reynobond cladding to the Grenfell Tower, despite knowing that it was unfit, defective, and dangerous for such use. At all times relevant hereto and specifically on the date of the fire, Arconic, Inc. (hereinafter referred to as "Arconic") is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business and headquarters and corporate epicenter located at 201 Isabella St., Pittsburgh, PA 15212.

**151.** At all times relevant hereto and specifically on the date of the fire, Defendant Arconic, was acting by and through its agents, servants, and/or employees, who were acting within the course and scope of their agency, service and/or employment with Defendant Arconic.

**152.** Defendant Arconic purposely established significant contacts in Pennsylvania, has carried out, and continues to carry out, substantial, continuous and systematic business activities in Pennsylvania, and regularly conducts business in Philadelphia County.

**153.** At all relevant times hereto and specifically on the date of the fire, Arconic was engaged in the business of designing, manufacturing, assembling, marketing, distributing and selling the Reynobond PE cladding and other cladding that is the subject of this litigation.

**154.** At all times relevant hereto and specifically on the date of the fire, Defendant Alcoa Inc. is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business and headquarters and corporate epicenter located at 201 Isabella St., Pittsburgh, PA 15212.

**155.** At all times relevant hereto and specifically on the date of the fire, Defendant Alcoa Inc. was acting by and through agents, servants, and/or employees, who were acting

within the course and scope of their agency, service and/or employment with Defendant Alcoa Inc.

**156.** Defendant Alcoa Inc. purposely established significant contacts in Pennsylvania, has carried out, and continues to carry out, substantial, continuous and systematic business activities in Pennsylvania, and regularly conducts business in Philadelphia County.

**157.** At all times relevant hereto and specifically on the date of the fire, Defendant Alcoa Inc. was engaged in the business of designing, manufacturing, assembling, marketing, distributing and selling the Reynobond PE and Reynobond FR cladding that is the subject of this litigation throughout Europe, the United States and including Philadelphia County.

**158.** At all times relevant hereto and specifically on the date of the fire, Defendant Arconic Architectural Products, LLC (“Arconic Architectural Products”) is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business and headquarters and corporate epicenter located at 201 Isabella St., Pittsburgh, PA 15212 and additional design and production facilities located at 50 Industrial Boulevard, Eastman GA 31023.

**159.** At all times relevant hereto and specifically on the date of the fire, Defendant Arconic Architectural Products was acting by and through agents, servants, and/or employees, who were acting within the course and scope of their agency, service and/or employment with Defendant Arconic Architectural Products.

**160.** Defendant Arconic Architectural Products purposely established significant contacts in Pennsylvania, has carried out, and continues to carry out, substantial, continuous and systematic business activities in Pennsylvania, and regularly conducts business in Philadelphia County.

**161.** At all times relevant hereto, Defendant Arconic Architectural Products was engaged in the business of designing, manufacturing, assembling, marketing, distributing and selling the Reynobond PE and Reynobond FR cladding that is the subject of this litigation throughout Europe, the United States, Pennsylvania and including Philadelphia County.

**162.** Defendants Arconic Inc., Alcoa Inc., Arconic Architectural Products, LLC and their agents, employees, officers, subsidiaries, parent corporations, sister corporations, predecessor corporations and successor corporations will hereinafter be collectively referred to as the “Arconic Defendants.”

**163.** Reynobond PE is a registered trademark of the Arconic Defendants.

**164.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries, predecessor companies, successor companies, and/or entities otherwise related to the Arconic Defendants were taken by said sister companies, subsidiaries, and/or otherwise related entities as alter-egos of the American-based Arconic Defendants.

**165.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries, parent companies and/or entities otherwise related to the Arconic Defendants, whether foreign or domestic, were carried out at the direction and command of, and under the supervision of, the American-based Arconic Defendants.

**166.** The blending of corporate personnel and responsibilities, as well as, financial and other resources enables the “piercing of the corporate veil” to hold the Arconic Defendants fully liable for the actions of any such sister companies, subsidiaries or otherwise related entities.

**167.** Defendant Celotex began its operations as the Celotex Corporation of America in 1921, establishing itself as a market leader in insulation, roofing and building materials.

**168.** Defendant Celotex reincorporated in 1964 and continued to operate in the insulation, roofing and building materials industries.

**169.** In the 1990s, Defendant Celotex was ravaged by asbestos litigation and, as a result, filed for bankruptcy in 1990 and reorganized in 1996-1997.

**170.** Following its bankruptcy and reorganization, Defendant Celotex continued to operate in the insulation, roofing, and building materials industries, selling its products worldwide.

**171.** In early 2012, Saint-Gobain, a multi-national corporation which brands itself as the world leader in the habitat and construction markets purchased Celotex.

**172.** Saint-Gobain continued to operate Celotex, and continued to design, engineer, manufacture, produce, market, distribute, and sell insulation, including the RS5000 PIR Insulation under the Celotex name.

**173.** Saint-Gobain continues to operate under the Celotex brand name and oversee and/or orchestrate the design, engineering, marketing, distribution, and sale of Celotex products, including its Insulation products, from its headquarters in Malvern, Pennsylvania.

**174.** At all times relevant hereto and specifically on the date of the fire, Defendant, Saint-Gobain Corporation d/b/a Saint-Gobain North America and/or d/b/a Celotex (hereinafter referred to as “Celotex”) is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business, headquarters and corporate epicenter located at 20 Moores Road, Malvern, PA 19355.

**175.** At all times relevant hereto and specifically on the date of the fire, Defendant Celotex was acting by and through agents, servants, and/or employees, who were acting within the course and scope of their agency, service and/or employment with Defendant Celotex.

**176.** Defendant Celotex purposely established significant contacts in Pennsylvania, has carried out, and continues to carry out, substantial, continuous and systematic business activities in Pennsylvania, and regularly conducts business in Philadelphia County.

**177.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries, parent companies, predecessor companies, successor companies and/or entities otherwise related to Defendant Celotex, whether foreign or domestic, were taken by said sister companies, subsidiaries, and/or otherwise related entities as alter-egos of Defendant Celotex.

**178.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries, and/or entities otherwise related to Defendant Celotex were carried out at the direction and command of, and under the supervision of, Defendant Celotex.

**179.** The blending of corporate personnel and responsibilities, as well as, financial and other resources enables the “piercing of the corporate veil” to hold Defendant Celotex fully liable for the actions of any such sister companies, subsidiaries or otherwise related entities.

**180.** At all times relevant hereto and specifically on the date of the fire, Defendant Celotex was engaged in the business of designing, manufacturing, assembling, marketing, distributing and selling the RS5000 insulation (hereinafter referred to as the “Insulation”) contained in external cladding system that is the subject of this litigation throughout Europe and the United States, including Philadelphia County.

**181.** In 2014, Defendant Whirlpool acquired Indesit Company, which owned and sold products under the brand name Hotpoint

**182.** In the 2014 acquisition, upon information and belief, Defendant Whirlpool acquired and took over Indesit Company's, and therefore Hotpoint's, assets and liabilities, including product liabilities.

**183.** Through proper due diligence, Defendant Whirlpool did or should have become aware of the numerous prior incidents with Hotpoint products, including the Model FF175BP fridge-freezer at issue in this case.

**184.** Through proper due diligence, Defendant Whirlpool did or should have become aware that there were prior incidents with Model FF175BP fridge-freezers manufactured in October, 2008, such as the subject Fridge-Freezer involved in this case.

**185.** Through proper due diligence, Defendant Whirlpool did or should have become aware of the numerous defective and highly dangerous products on the market and in the stream of commerce.

**186.** Through proper due diligence, Defendant Whirlpool did or should have become aware that over 64,000 defective FF175BP fridge-freezers had been distributed.

**187.** Defendant, Whirlpool Corporation (hereinafter referred to as "Whirlpool"), is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business located at 2000 N. M-63, Benton Harbor, MI 49022.

**188.** At all times relevant hereto, Defendant Whirlpool was acting by and through its agents, servants, and/or employees, who were acting within the course and scope of their agency, service and/or employment with Defendant Whirlpool.

**189.** Defendant Whirlpool purposely established significant contacts in Pennsylvania, has carried out, and continues to carry out, substantial, continuous and systematic business activities in Pennsylvania, and regularly conducts business in Philadelphia County.

**190.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries and/or entities otherwise related to Defendant Whirlpool were taken by said sister companies, subsidiaries, and/or otherwise related entities as alter-egos of Defendant Whirlpool.

**191.** Any actions relevant to this case which may have been carried out by sister companies, subsidiaries, parent companies, predecessor companies, successor companies and/or entities otherwise related Defendant Whirlpool, whether foreign or domestic, were carried out at the direction and command of, and under the supervision of, Defendant Whirlpool.

**192.** The blending of corporate personnel and responsibilities, as well as, financial and other resources enables the “piercing of the corporate veil” to hold Defendant Whirlpool fully liable for the actions of any such sister companies, subsidiaries or otherwise related entities.

**193.** At all times relevant hereto, Defendant Whirlpool was engaged in the business of designing, manufacturing, assembling, marketing, distributing and selling the Fridge-Freezer, model number FF175BP, that is the subject of this litigation throughout Europe and the United States, including Philadelphia County.

**194.** Defendants John Does (1-99) are the current and former officers, directors, agents, employees of defendants, their subsidiaries, parent companies, sister companies, successor companies, predecessor companies and/or otherwise related entities who made decisions related to the conduct described in this Complaint which led to the fire at the Grenfell Tower.

**195.** Defendants ABC Corporations (1-99) are designers, manufacturers, distributors, sellers, suppliers, marketers and/or were in the designing, manufacturing, distributing, selling,

supplying, and/or marketing hierarchy of control for the subject products which are described in this Complaint which led to the fire at the Grenfell Tower.

**196.** Defendants XYZ Corporations (1-99) are the subsidiaries, parent companies, sister companies, successor companies, predecessor companies and/or otherwise related entities to the parties to this action who were involved in the design, manufacturing, or creation of the products described in this Complaint which led to the fire at the Grenfell Tower.

**197.** Pursuant to Pa.R.Civ.P. 2005, Defendants John Does (1-99), ABC Corporations (1-99), and XYZ Corporations (1-99) are Doe designated defendants added to this action where their actual name/identity is unknown despite a reasonable and diligent search.

**198.** Plaintiffs reserve the right to amend this Complaint and name said unknown individuals and/or entities, as aforementioned, as additional defendant pursuant to Pennsylvania Rules of Civil Procedure 2005 and 1033.

**199.** All defendants are registered corporations in Pennsylvania who have consented to the general jurisdiction of Pennsylvania courts and/or have otherwise exercised sufficient contacts with Pennsylvania and specifically with Philadelphia County for jurisdiction and venue to be proper.

#### **JURISDICTION, FORUM, AND VENUE**

**200.** Plaintiff, Kristen Behrens, is a citizen of the Commonwealth of Pennsylvania.

**201.** The Arconic Defendants' are citizens of the Commonwealth of Pennsylvania, with a principal place of business and corporate nucleus of operations located in Pittsburgh, Pennsylvania.

**202.** Defendant Celotex is a citizen of the Commonwealth of Pennsylvania.



**203.** Accordingly, because Plaintiff, Kristen Behrens, and the Arconic Defendants and Defendant Celotex are all citizens of the Commonwealth of Pennsylvania, there is no diversity of citizenship and this litigation is proper in state court.

**204.** Each Defendant has litigated scores of cases in the Philadelphia Court of Common Pleas.

**205.** As averred throughout this Complaint, each Defendant does substantial business in Philadelphia County.

**206.** Arconic has acknowledged through shareholder litigation (*Howard v. Arconic Inc., et al.*, Docket No. 2:17-cv-01057 (W.D.Pa.)) that Pennsylvania Courts are a proper venue and forum for litigating disputes arising from the Grenfell Tower tragedy.

**207.** Plaintiffs' claims, as fully stated herein, all center on the outrageous, willful, wanton, and reckless conduct of Defendants, all of which occurred in the United States and, with regards to the Arconic Defendants and Defendant Celotex, specifically in the Commonwealth of Pennsylvania.

**208.** The Arconic Defendants designed, engineered, marketed, sold, and/or tested the product at issue, the Reynobond 55 PE cladding, within the Commonwealth of Pennsylvania.

**209.** All control, supervision, and ultimate decision-making that resulted in the Arconic Defendants knowingly and outrageously supplying the unfit, defective, and dangerous Reynobond cladding to the Grenfell Tower, was exerted by the Arconic Defendants from their nucleus of operations in Pittsburgh, Pennsylvania.

**210.** The Arconic Defendants' conduct on which Plaintiffs' claims are founded was all orchestrated by the Arconic Defendants' from their nucleus of operations in Pittsburgh, Pennsylvania.

211. Defendant Celotex designed, engineered, marketed, sold, and/or tested the Celotex RS5000 PIR Insulation within the Commonwealth of Pennsylvania, specifically from its headquarters in Malvern, Pennsylvania.

212. All control, supervision, and ultimate decision-making that resulted in Defendant Celotex knowingly and outrageously supplying the defective, dangerous, and completely unfit Insulation to the Grenfell Tower was exerted by Defendant Celotex from its headquarters in Malvern, Pennsylvania.

213. Defendant Celotex's conduct on which Plaintiffs' claims are founded was orchestrated by Defendant Celotex from its headquarters in Malvern, Pennsylvania.

214. The Commonwealth of Pennsylvania has a substantial interest in regulating and controlling the conduct of corporations which operate within the Commonwealth of Pennsylvania.

215. The Commonwealth of Pennsylvania has a substantial interest in preventing corporations within its borders from acting in a reckless, willful, wanton, and punitive manner, as the Arconic Defendants and Defendant Celotex acted in this case.

216. Defendant Whirlpool is and at all relevant times was, registered to conduct business in the Commonwealth of Pennsylvania and has thus consented to this Honorable Court's exercise of personal jurisdiction over Defendant Whirlpool.

217. Defendant Whirlpool intentionally and specifically targets the Commonwealth of Pennsylvania for the sale of its products and for the provision of its services, all of which inured substantial profits and economic benefit to Defendant Whirlpool.

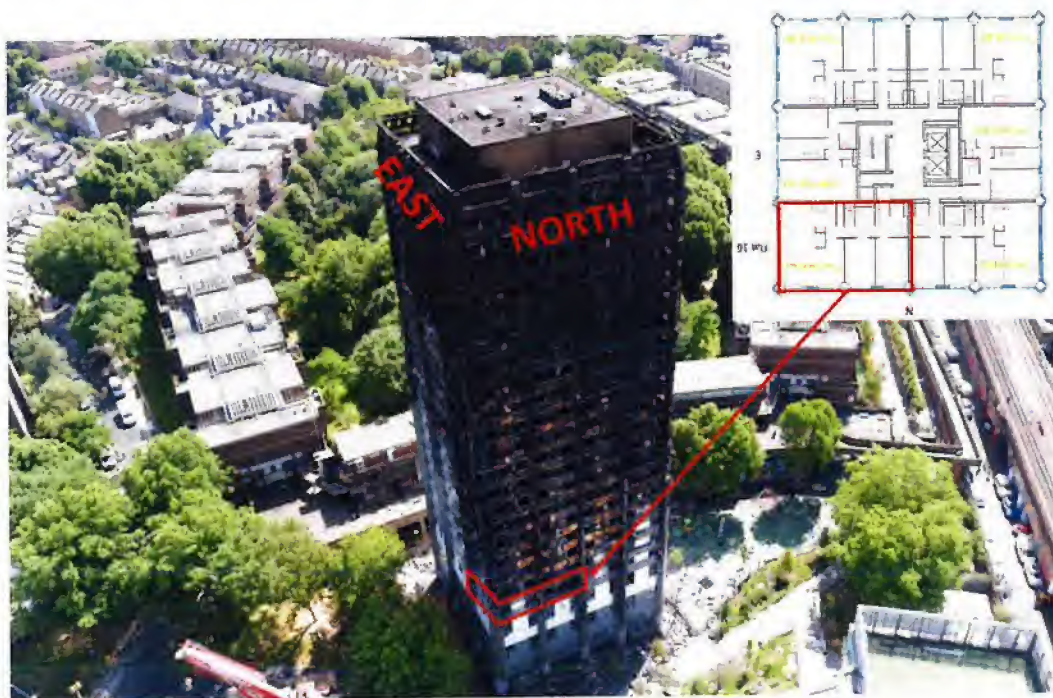
**THE TRAGIC EVENTS OF JUNE 14, 2017**

**218.** In the early morning hours of June 14, 2017, shortly before 1:00 a.m., a fire broke out in Flat 16 of the Grenfell Tower.

**219.** The Tower is a twenty-five story residential apartment building measuring 220 feet, 10 inches tall and containing 120 one- and two-bedroom flats, with Ground, Level 1, 2 and 3 assigned to non-residential purposes.

**220.** The fire began when a dangerously defective Whirlpool Fridge-Freezer, model number FF175BP, malfunctioned and ignited in the kitchen of Flat 16.

**221.** Flat 16 is on the fourth floor in the Northeast corner of the Tower:



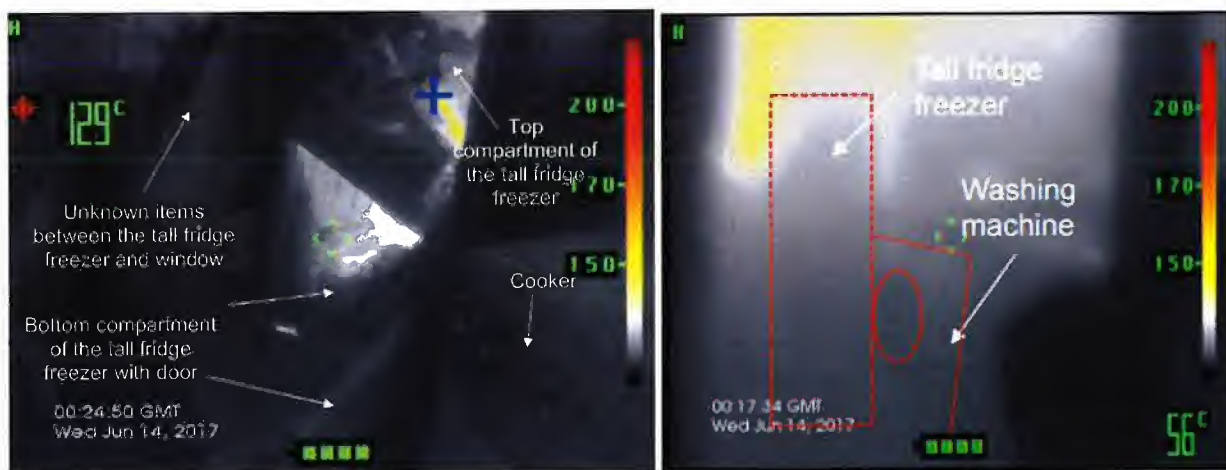
#### **I. HOW THE FIRE STARTED**

**222.** Post-fire investigation confirmed that the area in which the fire originated within Flat 16 was in the southeast corner of the kitchen, where the subject Whirlpool Fridge-Freezer was located.



**223.** The first firefighters to enter Flat 16 during the rescue efforts, found that the only room in Flat 16 which contained a fire was the kitchen.

**224.** Images from the responding firefighters' Thermal Image Cameras ("TICs") confirm hot areas in the southeast corner of the kitchen and specifically within and around the Whirlpool Fridge-Freezer.







225. Examination of the laminate flooring in the kitchen revealed a burn pattern directly underneath the Whirlpool Fridge-Freezer that was not present on any other area of the kitchen's laminate flooring.

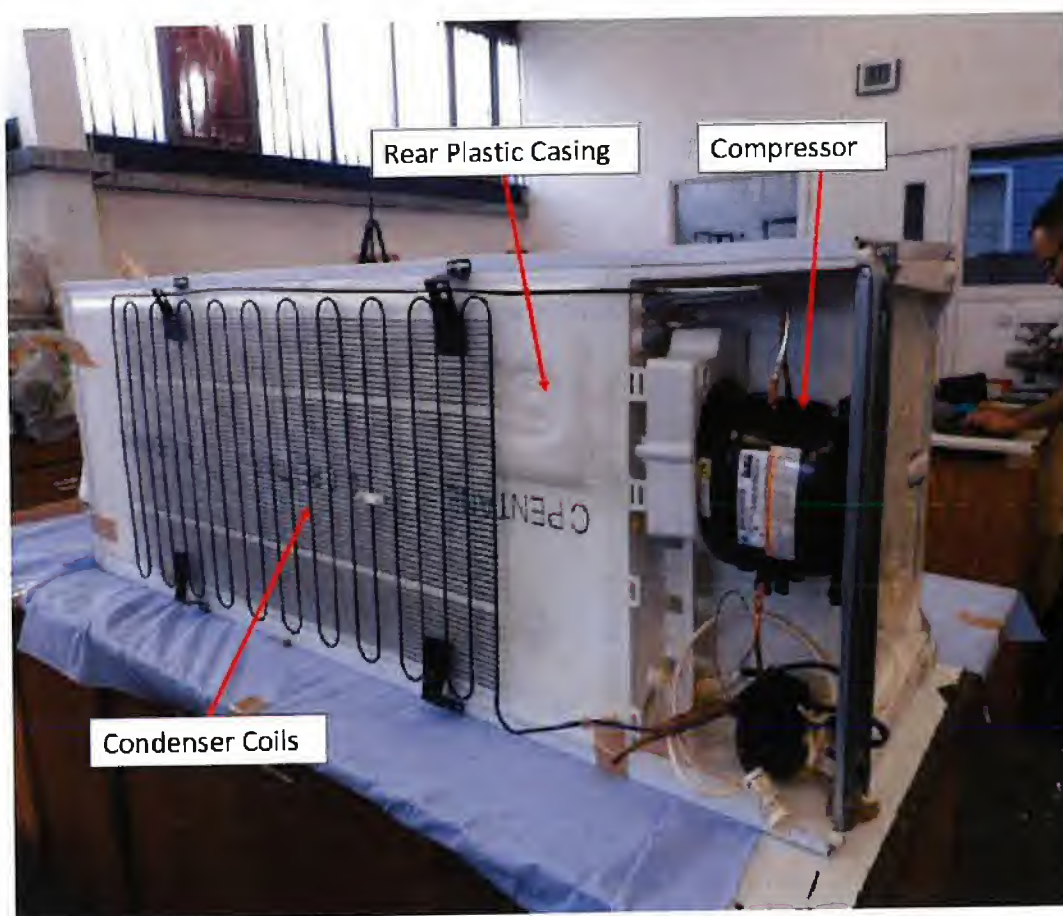
226. The burn pattern on the laminate flooring directly underneath the Whirlpool Fridge-Freezer, depicted below, demonstrates that this area was exposed to a heat source or direct flame to a greater extent than any other area of the kitchen floor.



227. All of the other electrical appliances in the kitchen of Flat 16 in and/or around the area of the fire origin were ruled out as causes of the fire.

228. The specific Whirlpool Fridge-Freezer was a model number FF175BP, alleged to have been manufactured in October, 2008.

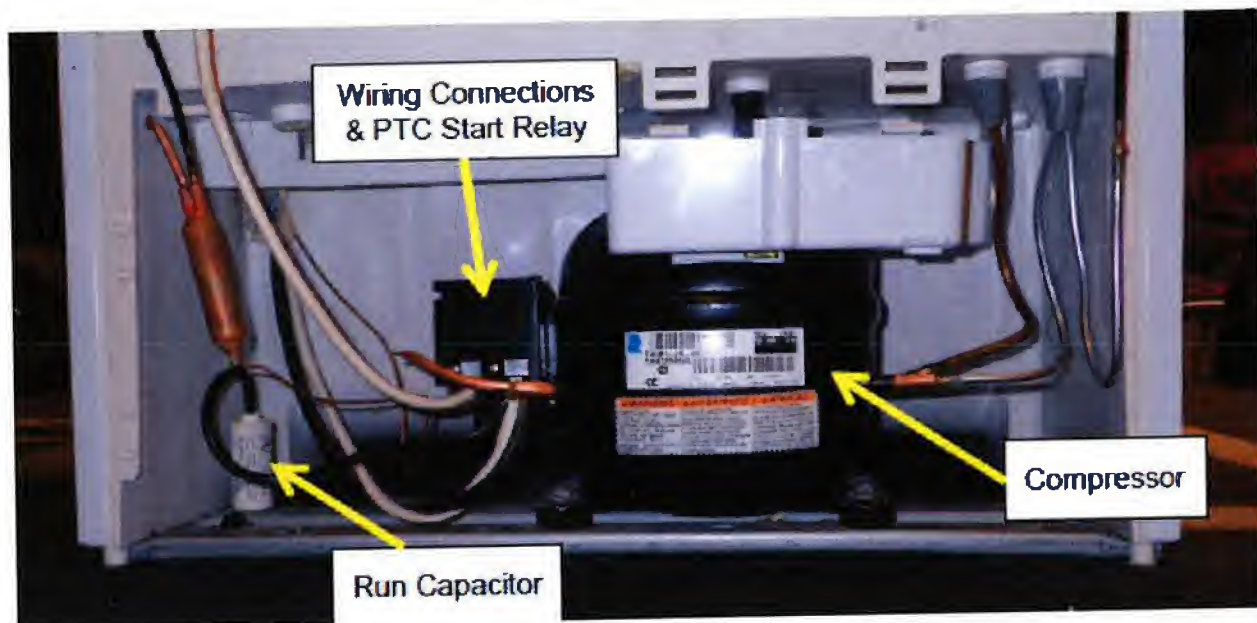
229. The back of the Whirlpool Fridge-Freezer FF175BP consists of a rear plastic casing, condenser coils, and a compressor located in the bottom rear of the Fridge-Freezer, shown in the below image of an exemplar Whirlpool Fridge-Freezer model number FF175BP that was provided by Whirlpool representatives:



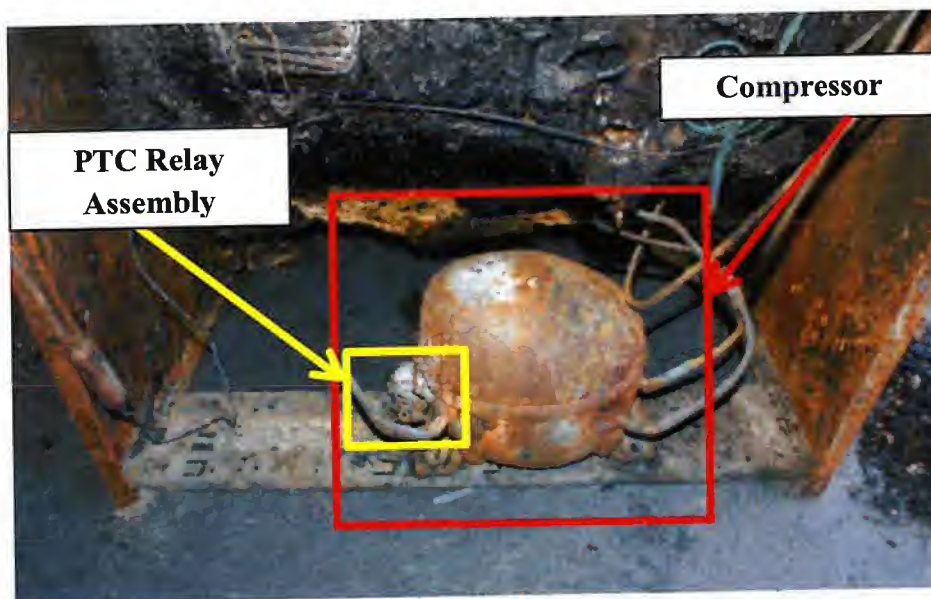
230. The subject Whirlpool Fridge-Freezer's rear plastic casing was highly flammable and, upon information and belief, Defendant Whirlpool knew that the rear plastic casing was highly flammable and for that reason doesn't allow manufacturing for sale in the United States with plastic components.

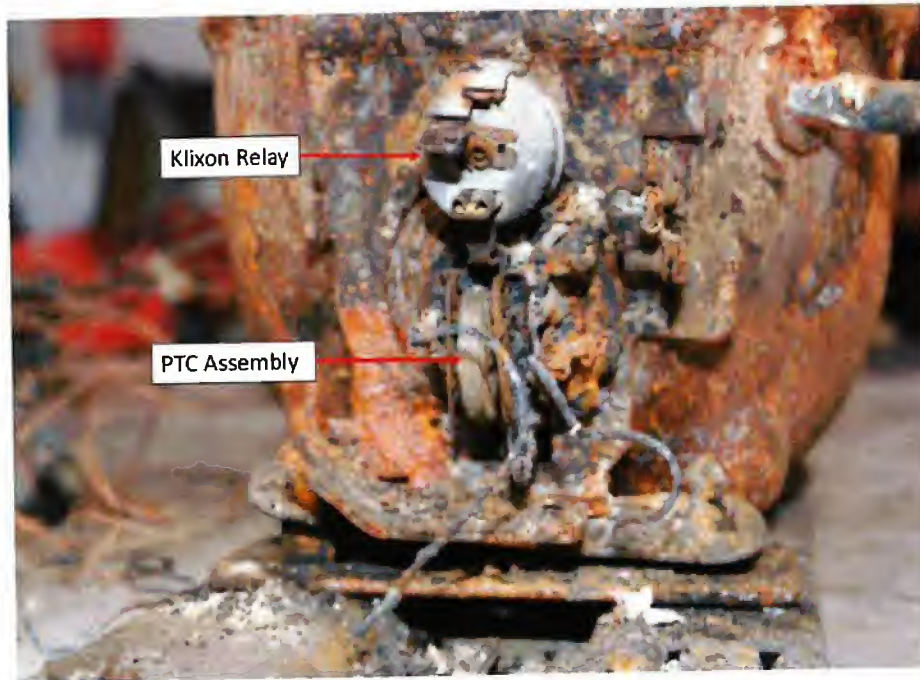


231. The bottom rear of the Whirlpool FF175BP fridge-freezer, including the subject Fridge-Freezer, contains a compressor, Positive Temperature Coefficient (“PTC”) relay compartment, and a run capacitor, shown in the exemplar below:



232. The photographs below show the compressor in the bottom rear of the subject Whirlpool Fridge-Freezer from Flat 16, and the PTC relay compartment before being removed from the compressor:





233. Following the fire, investigators and experts recovered numerous wires and wire connectors from the compressor relay compartment of the subject Fridge-Freezer.

234. One of the wire connectors from the compressor relay compartment of the subject Fridge-Freezer, shown below labeled Exhibit “JDG/6B” by investigators, was found to have a defective and dangerous crimp connection:

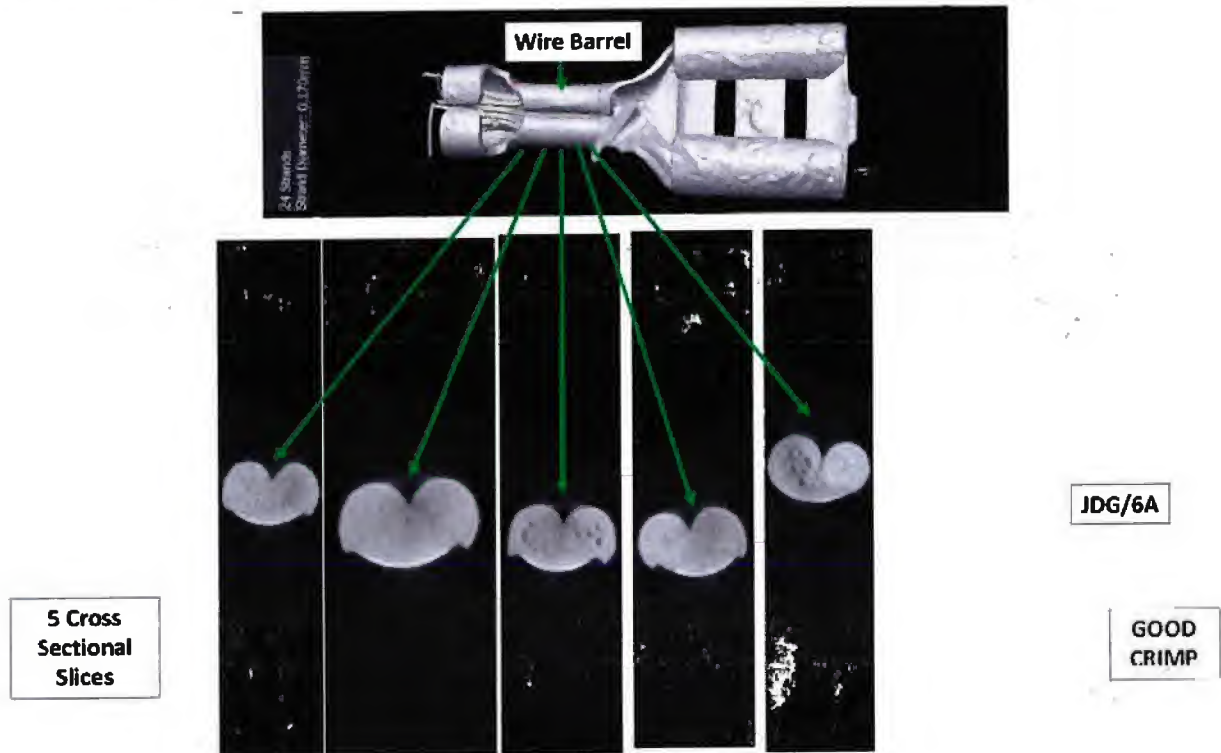




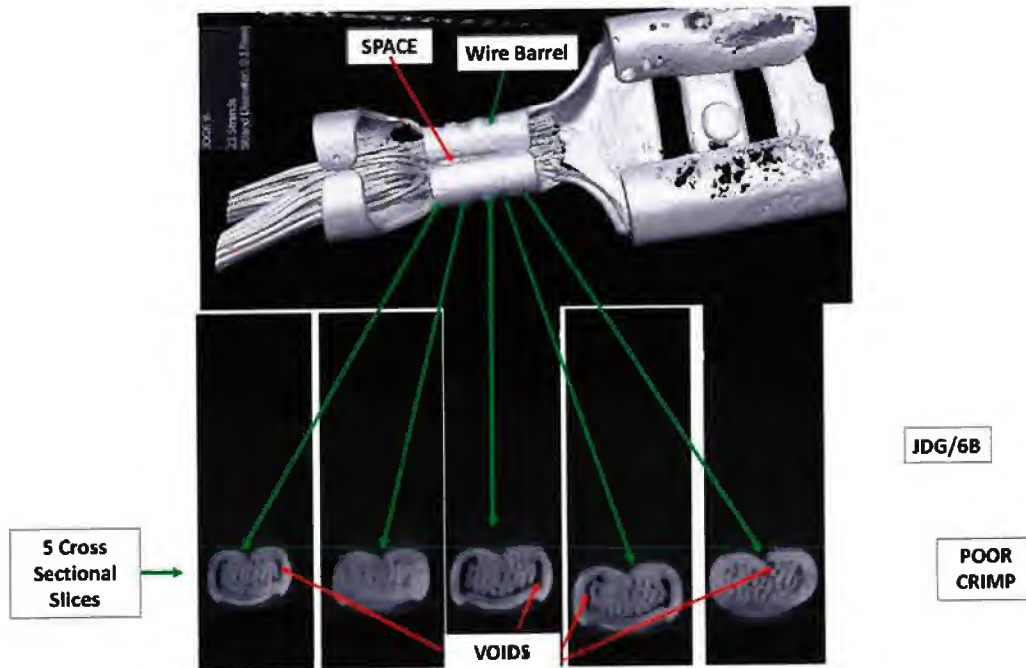
**235.** A well-engineered and well-executed crimp connection is a solderless electrical connection that is achieved by compressing multiple individual wires together into a tight bundle/arrangement that is held within a metal barrel on the connector.

**236.** When a crimp connection is properly executed, there will be minimal, if any, voids between the compressed individual wires.

**237.** A wire connector recovered from the compressor relay compartment that had proper and adequate crimping was examined by CT scan and demonstrates what is seen in a well-executed crimp connection, i.e., no voids between the compressed individual wires:



**238.** A CT scan of the recovered crimp connector labeled Exhibit JDG/6B revealed a poorly-executed and dangerously defective crimp connection with numerous unacceptable voids between the individual wires and space between the crimp connector barrel and the wires:



**239.** The voids and spaces seen in the JDG/6B crimping connection recovered from the subject Whirlpool Fridge-Freezer compressor relay compartment are a result of inadequate compression force during the crimping process.

**240.** The voids and spaces seen in the JDG/6B crimping connection, above, are an easily-preventable defective condition of the subject Whirlpool Fridge-Freezer that is completely and unacceptably unsafe.

**241.** Poor crimping leads to a decrease in contact area between the connector and wire strands, which in turn is accompanied by an increase in the associated contact resistance as well as a corresponding increase in connector power loss, which results in overheating of the connector.

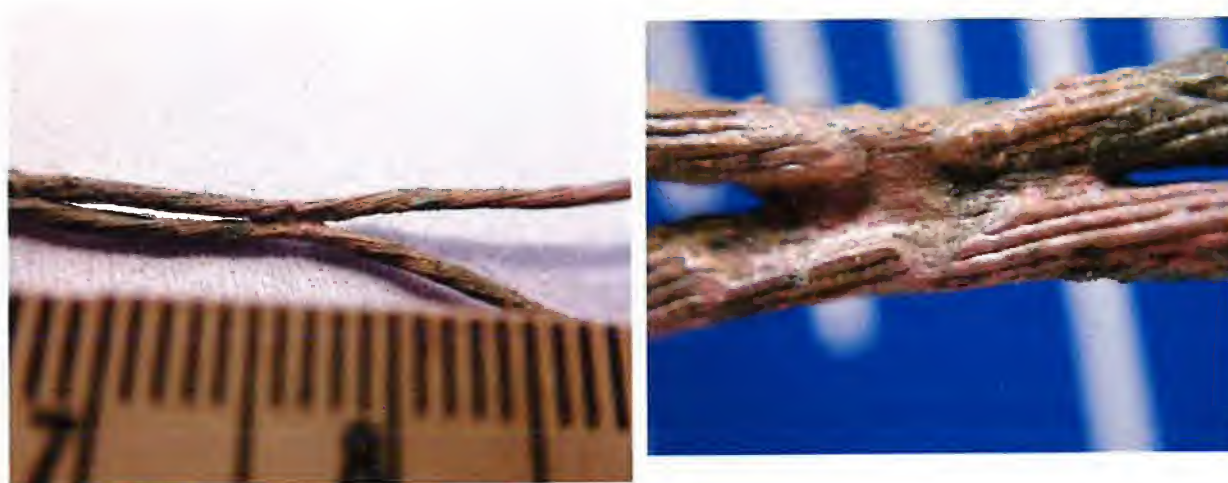
**242.** Connectors exposed to long-term high temperatures, such as the JDG/6B crimping connection from the subject Fridge-Freezer, experience a buildup of an oxide layer, which progressively increases contact resistance, further increasing the temperature.

**243.** As a direct result of Defendant Whirlpool's defective and dangerous crimp connector, JDG/6B, the energized wire within the subject Fridge-Freezer's compressor relay compartment overheated and ignited.

**244.** The heat from the fire started by the defective and dangerous crimp connector melted off the insulation on adjacent wires, resulting in a short circuit, or "arc fault," from the energized wire across the run capacitor wires in the compressor relay compartment.

**245.** The aforementioned arc fault created tremendous temperatures within the compressor relay compartment, well in excess of the melting point of copper wires (approximately 1,980 degrees Fahrenheit) and started the fire.

**246.** The arcing within the compressor relay compartment is further confirmed by a recovered wire from the run capacitor which was arc damaged:



**247.** The fire was able to quickly escape the compressor relay compartment and the area in the bottom rear of the subject Fridge-Freezer as a direct result of the highly flammable plastic casing on the rear of the subject Fridge-Freezer.

**248.** The highly flammable plastic casing on the subject Fridge-Freezer quickly ignited and the flames rapidly began spreading from the subject Fridge-Freezer to the area immediately

surrounding the subject Fridge-Freezer before the flames eventually exited Flat 16 through the kitchen window, igniting the Tower's exterior cladding.

**249.** The fire was caused to escape the confines of the subject Whirlpool Fridge-Freezer so aggressively and rapidly as a direct result of the highly flammable plastic casing on the subject Fridge-Freezer.

**250.** The fire, which began in Flat 16 was completely controllable and readily escapable as evidenced by the occupants of Flat 16 escaping.

**251.** The true harm and cause of the devastation took place when the fire reached the defective and dangerous exterior components of the building.

## **II. THE REFURBISHMENT OF GRENFELL TOWER**

**252.** The Grenfell Tower Refurbishment Project sought to both re-design the interior layout of the Tower's flats, increasing the total number of flats from 120 to 127, and increasing the total number of bedrooms in the Tower from 200 to 227.

**253.** The Grenfell Tower Refurbishment Project also sought to upgrade the exterior of the building to a more modern look that would also replace the substandard heating system, replace the windows, and increase the thermal efficiency of the tower.

**254.** At the outset of the refurbishment, the estimated costs for the project were 8.7 million Pounds.

**255.** To accomplish the exterior aspect of the refurbishment, the Tower was supplied with the Arconic Defendants rainscreen aluminum composite panel cladding—the subject Reynobond PE—that was installed over the existing concrete construction of the Tower, with Defendant Celotex's RS5000 PIR Insulation installed between the Reynobond PE cladding and the concrete exterior walls.





256. The Arconic Defendants preyed on the victims of the Grenfell Tower by offering to supply cheaper Reynobond PE, which cost approximately 300,000 Pounds less than its fire resistant cladding, the Reynobond FR, yet was not safe for residential use.

257. The Tower was encased in a rainscreen cladding system that was installed during a large scale renovation of the Tower from 2012 to 2016.

258. The external wall construction of the Tower was originally of concrete construction, but the refurbishment of the Tower from 2012 to 2016 encased the Tower in a drained and ventilated rainscreen cladding system.

### **III. THE EXTERNAL FACADE OF THE GRENFELL TOWER**

259. The rainscreen cladding system utilized from Levels 4-23 of the Tower was Reynobond 55 PE 4mm Smoke Silver Metallic E9107S DG 5000 Washcoat (hereinafter “Reynobond PE”), which was designed, manufactured, and sold by the Arconic Defendants.

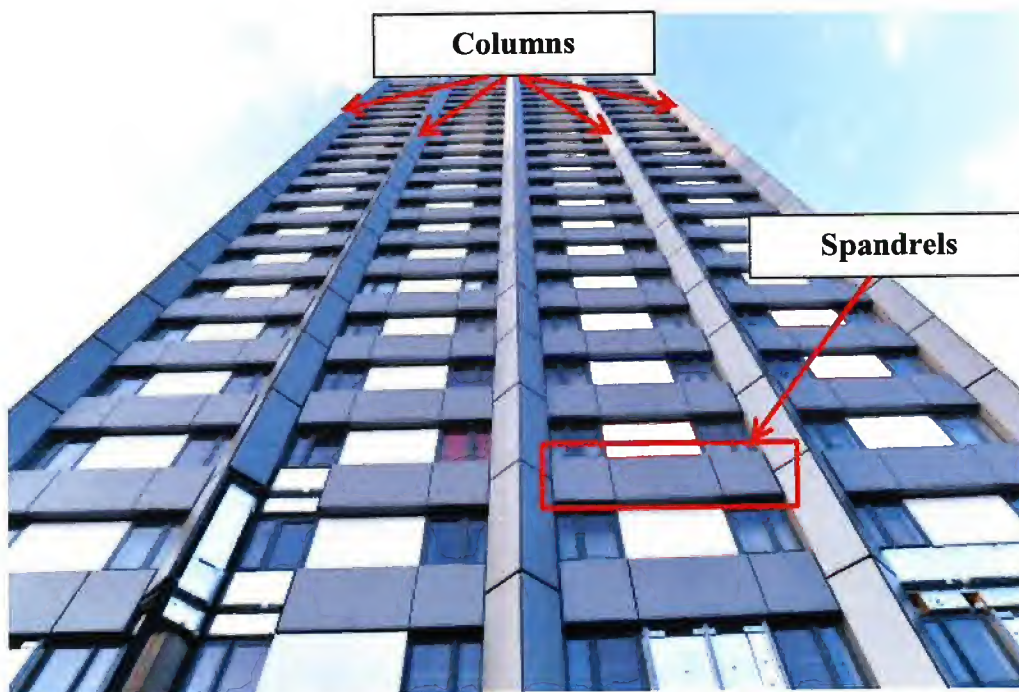
**260.** The Reynobond PE cladding consists of aluminum composite panels, a polyethylene core, and a ventilation cavity.

**261.** The polyethylene core of the Reynobond PE cladding is highly flammable.

**262.** Arconic makes a fire resistant version of its Reynobond cladding, which is known as Reynobond FR.

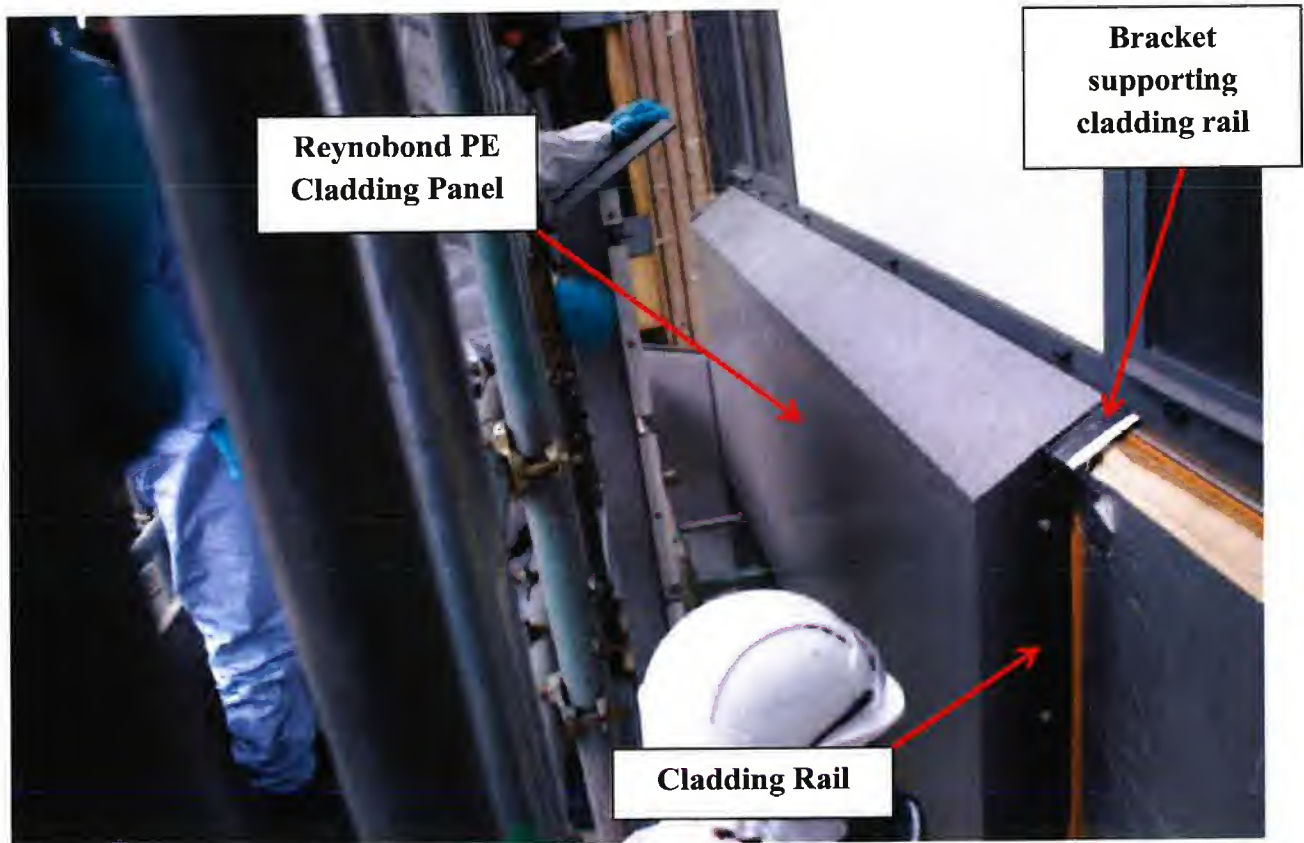
**263.** Upon information and belief, Reynobond PE is cheaper to manufacture than Reynobond FR.

**264.** The ventilation cavity of the Reynobond PE cladding system was approximately 140 mm in depth over the columns which ran vertically up the face of the Tower, and approximately 155 mm in depth over the spandrels (spandrels are horizontal sections running above and below the windows of the flats, and connecting each column):



**265.** The Reynobond PE cladding panels on the spandrels were hung on vertical cladding rails and affixed to the building as follows:

- a. Steel angles were fixed to the window head and sill along the majority of the length of the window opening;
- b. Brackets were then fixed to the steel angles;
- c. Cladding rails were then fixed to the brackets;
- d. The Reynobond PE cladding panels were then “hung” on the cladding rail.



266. The Reynobond PE cladding was dangerously and defectively designed and manufactured in that it was extremely flammable and completely unfit for use in a high-rise apartment building.

267. European Standard EN 13501-1 provides the reaction to fire classification for all products and building elements and, according to this standard, reaction to a fire is the response of a product in contributing by its own decomposition to a fire to which it is exposed. EN 13501-1 classifies construction products as Class A-F.



268. The Reynobond PE cladding was classified as a Class E under EN 13501-1, meaning that it was “combustible materials – highly contribution to fire”

|   | Classification according to European Standard EN 13501-1 |            |            |                       |     |
|---|--|------------|------------|-----------------------|-----|
| Definition  | Construction products                                    |            |            |                       | Flc |
| non-combustile materials                                  | A1   |            |            |                       |     |
|   | A2 - s1 d0   | A2 - s1 d1 | A2 - s1 d2 | A2 <sub>fl</sub> - s1 |     |
|   | A2 - s2 d0   | A2 - s2 d1 | A2 - s2 d2 |                       |     |
|   | A2 - s3 d0   | A2 - s3 d1 | A2 - s3 d2 |                       |     |
| combustible materials - very limited contribution to fire | B - s1 d0  | B - s1 d1  | B - s1 d2  | B <sub>fl</sub> - s1  |     |
|   | B - s2 d0  | B - s2 d1  | B - s2 d2  |                       |     |
|   | B - s3 d0  | B - s3 d1  | B - s3 d2  |                       |     |
| combustible materials - limited contribution to fire      | C - s1 d0  | C - s1 d1  | C - s1 d2  | C <sub>fl</sub> - s1  |     |
|   | C - s2 d0  | C - s2 d1  | C - s2 d2  |                       |     |
|   | C - s3 d0  | C - s3 d1  | C - s3 d2  |                       |     |
| combustible materials - medium contribution to fire       | D - s1 d0  | D - s1 d1  | D - s1 d2  | D <sub>fl</sub> - s1  |     |
|   | D - s2 d0  | D - s2 d1  | D - s2 d2  |                       |     |
|   | D - s3 d0  | D - s3 d1  | D - s3 d2  |                       |     |
| combustible materials - highly contribution to fire       | E  |            | E - d2     |                       |     |
| combustible materials - easily flammable                  | F  |            |            |                       |     |

269. Upon information and belief, the Arconic Defendants knew that its Reynobond PE cladding was classified as Class E and that it was combustible and highly flammable.

270. The Reynobond PE was classified by European regulation as “combustible materials – highly contribion to fire” pursuant to Approved Document B 2013 (“ADB 2013”), Section 12, Regulation B4, which required external walls to “adequately resist the spread of fire over the walls and from one building to another.”

271. As discussed more in depth herein, the Reynobond PE cladding that the Arconic Defendants knowingly supplied to the Grenfell Tower was wholly unfit and exceptionally dangerous for use on the Tower given the Tower’s height.

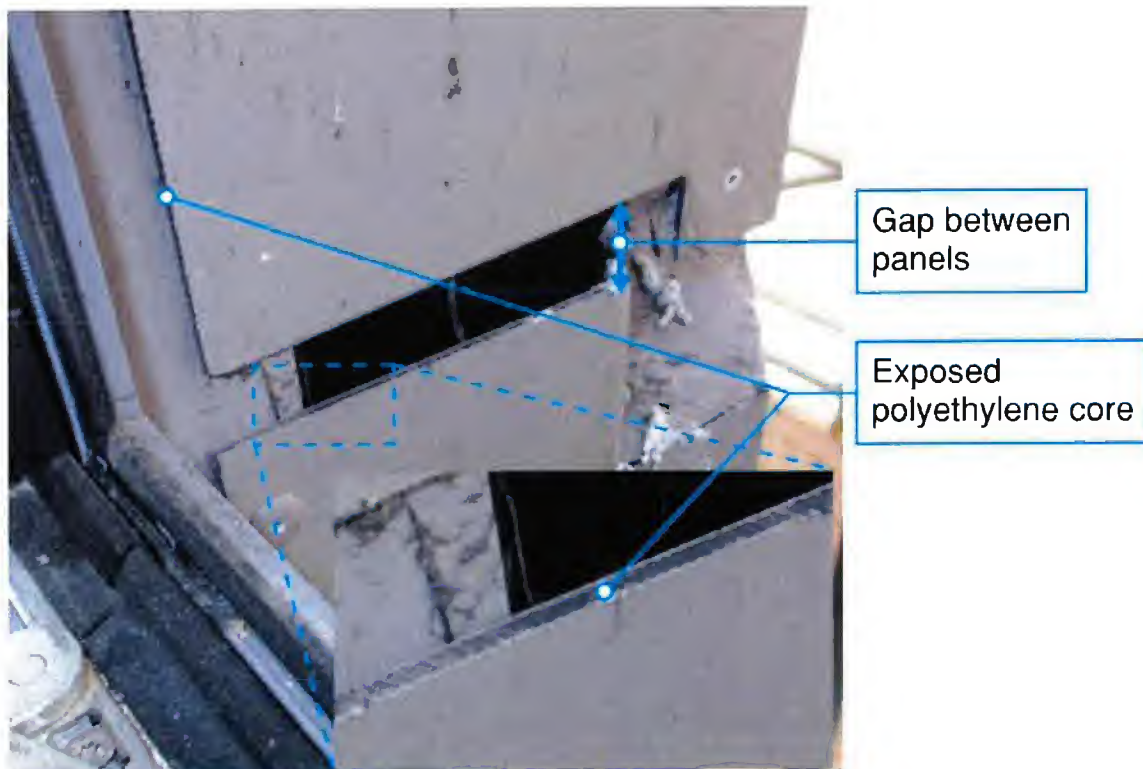
272. Upon information and belief, the Arconic Defendants knew that the Reynobond PE cladding should not have been used on the Grenfell Tower due to its dangerous flammability and the risk that it posed to each and every resident of the Tower.



**273.** Despite this knowledge and in an act of pure corporate greed, the Arconic Defendants knowingly supplied the Reynobond PE cladding to the Grenfell Tower even though, upon information and belief, the Arconic Defendants knew that the Reynobond PE was extremely flammable and the Arconic Defendants knew that the Reynobond PE cladding should not be installed on buildings as tall as Grenfell Tower.

**274.** The outrageous decision to supply the Grenfell Tower with Reynobond PE cladding, while knowing that such cladding was improper and dangerous for use on the Tower, was made, orchestrated, and overseen by the Arconic Defendants' nucleus of operations in Pittsburgh, Pennsylvania.

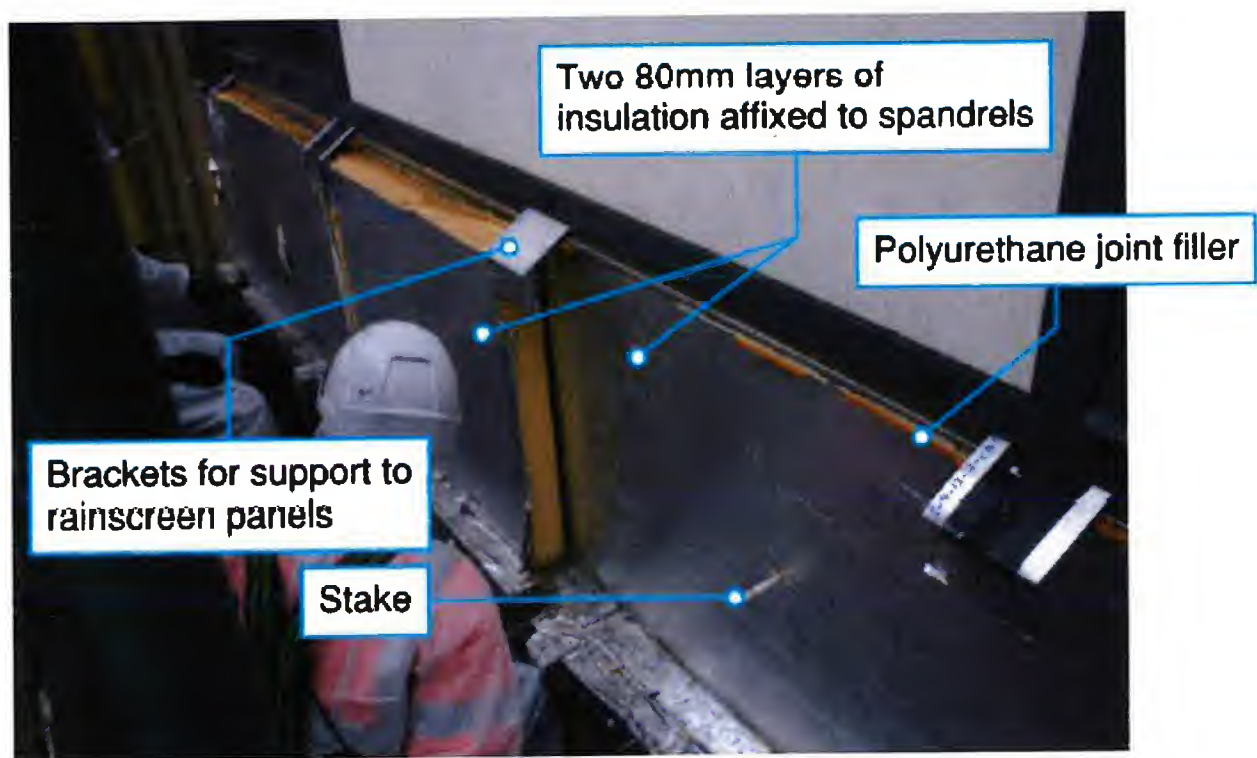
**275.** The Reynobond PE cladding is also dangerously and defectively designed and manufactured in that the highly flammable polyethylene core of the Reynobond PE cladding was exposed around the perimeter of the panel and thus susceptible to fire infiltration, ignition, and combustion:



**276.** Behind the Reynobond PE cladding panels on the spandrels, two layers of 80 mm combustible Celotex RS5000, a highly flammable polyisocyanurate (“PIR”) was affixed to the external face of the existing concrete spandrel panels.

**277.** The insulation was affixed by a 180 mm stake screwed into the face of the existing concrete spandrel and which pierced the Celotex RS5000 PIR insulation, thus mechanically fixing the insulation to the existing structure.

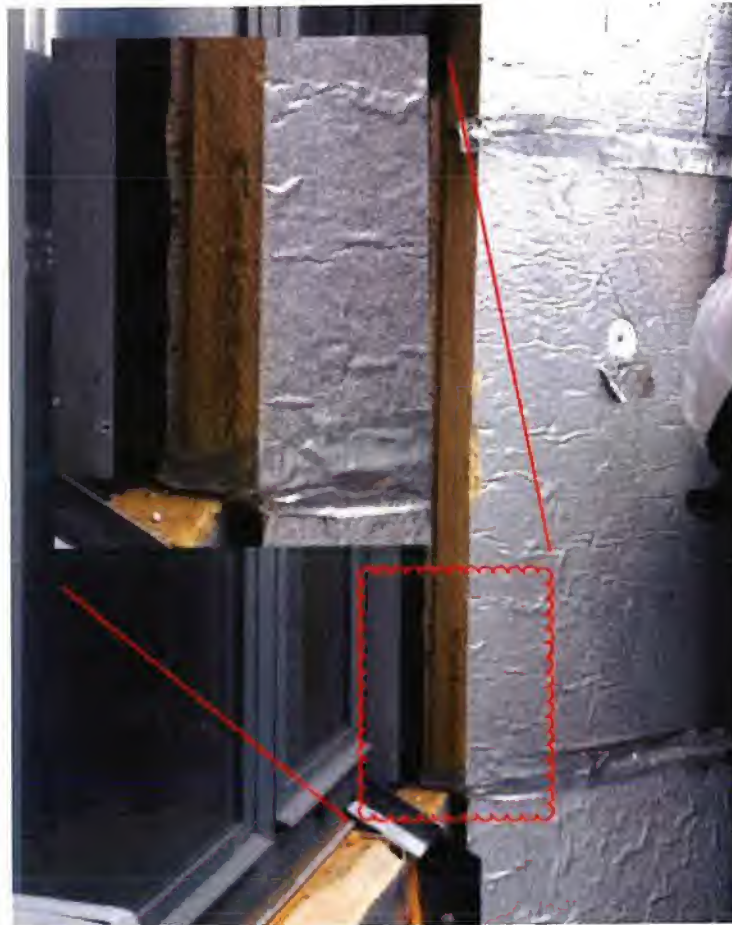
**278.** Over the spandrels, there was a ventilation cavity of approximately 156 mm in depth between the inside face of the Reynobond PE cladding panels and the outer face of the Celotex RS5000 PIR Insulation.



**279.** Over the columns, there was cavity depth of approximately 139 mm between the inside face of the Reynobond PE cladding panel and the outer face of the Celotex RS5000 PIR insulation.

**280.** The Celotex RS5000 PIR insulation was mechanically affixed to the columns in the same manner as how it was applied to the spandrels.

**281.** There is no question that Celotex RS5000 PIR insulation was the insulation affixed to the exterior of the Tower, behind the Reynobond PE cladding and ventilation cavity. This was confirmed by post-accident investigation:



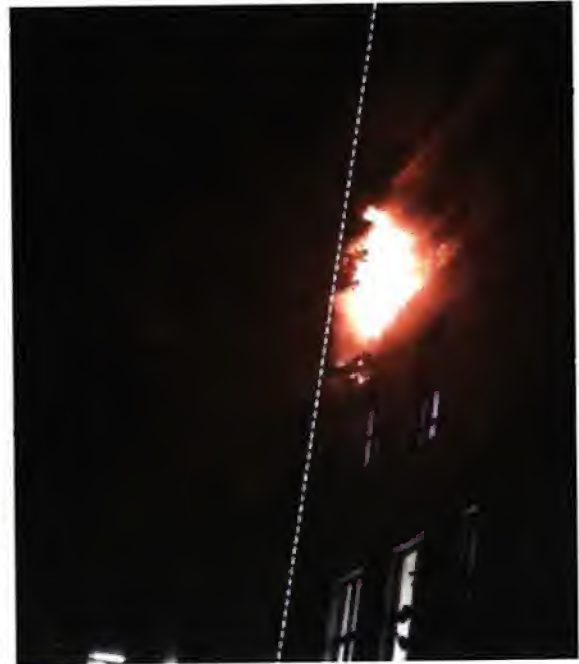
**IV. HOW THE REYNOBOND PE CLADDING AND CELOTEX RS5000 INSULATION CAUSED THE RAPID, UNCONTROLLABLE AND DEVASTATING FIRE SPREAD**

**282.** The fire first began exiting the kitchen window of Flat 16 at approximately 1:08 a.m., and the fire first spread to the Reynobond PE cladding and Celotex RS5000 PIR Insulation by 1:14 a.m., as shown in the photographs below:





**1:08 a.m.**

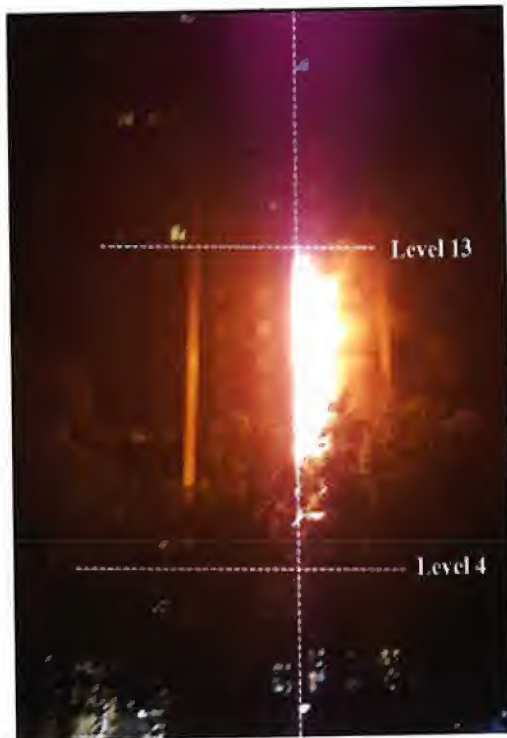


**1:14 a.m.**

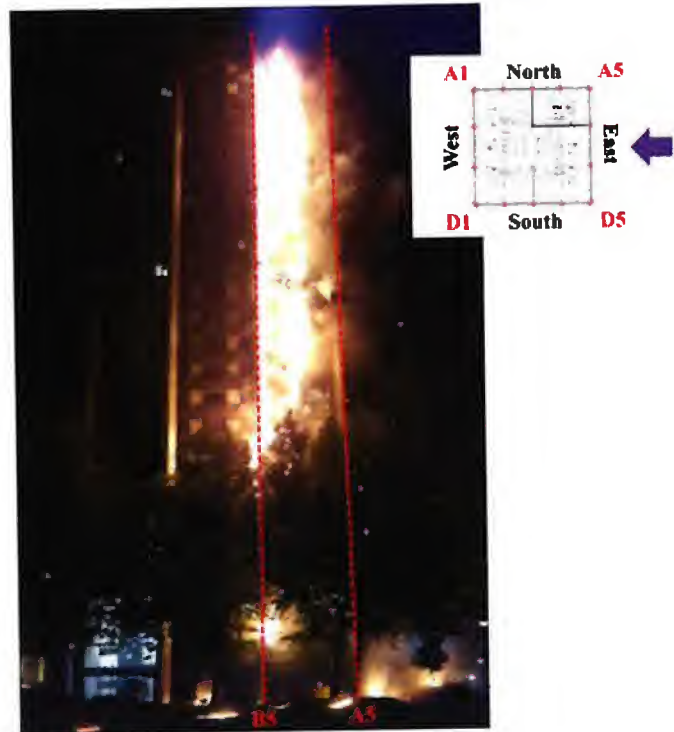
**283.** Once the fire penetrated the aluminum panels, the highly flammable polyethylene core of the Reynobond PE cladding and Celotex RS5000 insulation were exposed, became ignited, fed the fire and caused it to accelerate and increase in size and intensity.

**284.** The ventilation cavity in the cladding acted as an additional source of oxygen for the blaze, providing significant air flow and even more fuel for the fire.

**285.** The Reynobond PE cladding and Celotex RS5000 exacerbated the spread of the fire so severely that by 1:26 a.m.—just twelve (12) minutes after the fire had first spread to the cladding and insulation—the fire had already raced up nineteen (19) floors, to Level 23:



**1:22 a.m.**



**1:26 a.m.**

**286.** By 1:29 a.m., the fire had spread vertically up the East face to the top of the Tower.

**287.** As the fire reached the top of the Tower, the Reynobond PE cladding with its dangerously exposed and highly flammable polyethylene core, and the Celotex RS 5000 PIR Insulation, provided the fire with all of the fuel it needed to continue its spread across the building.

**288.** At 1:29 a.m., the fire began spreading horizontally across the Reynobond PE cladding and Celotex RS5000 PIR Insulation, spreading from the East face of the Tower to the North face.

**289.** By 1:36 a.m., the Reynobond PE cladding and Celotex RS5000 PIR Insulation caused the fire to begin spreading across the East face of the Tower towards the southeast corner of the Tower, creating two distinct Flame Spread Routes:



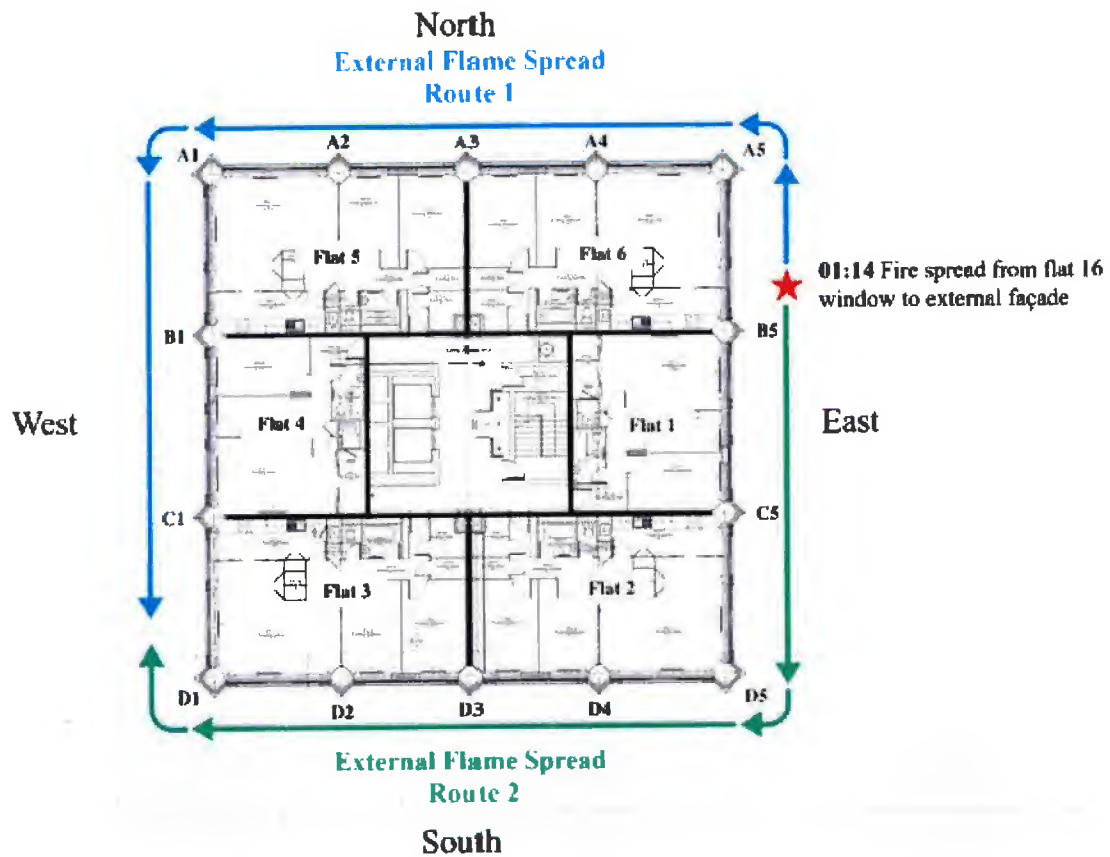
**1:29 a.m.**



**1:36 a.m.**

**290.** These two distinct Flame Spread Routes were each fed and exacerbated by the Reynobond PE cladding and Celotex RS5000 PIR Insulation, with Flame Spread Route 1 traveling from Flat 16, in the northeast corner of the Tower, across the North and West faces of the tower, until it converged with Flame Spread Route 2, which traveled from Flat 16 across the East face of the tower before converging with Spread Route 1 in the Southwest corner of the Tower.

**291.** The two distinct Flame Spread Routes are depicted below:



292. As the Reynobond PE cladding and Celotex RS5000 PIR Insulation caused the fire to race across the Tower, the cladding which had become engulfed in flames caused fire to enter back into the Tower through the windows of the flats.

293. By 2:22 a.m., the fire had decimated the East face of the Tower, caused fires within the flats on the East face, and was ravaging the North face of the Tower.

294. By 3:23 a.m., the North face of the Tower had become completely involved in fire, and the fire was quickly engulfing the West face of the Tower:





**2:22 a.m.**

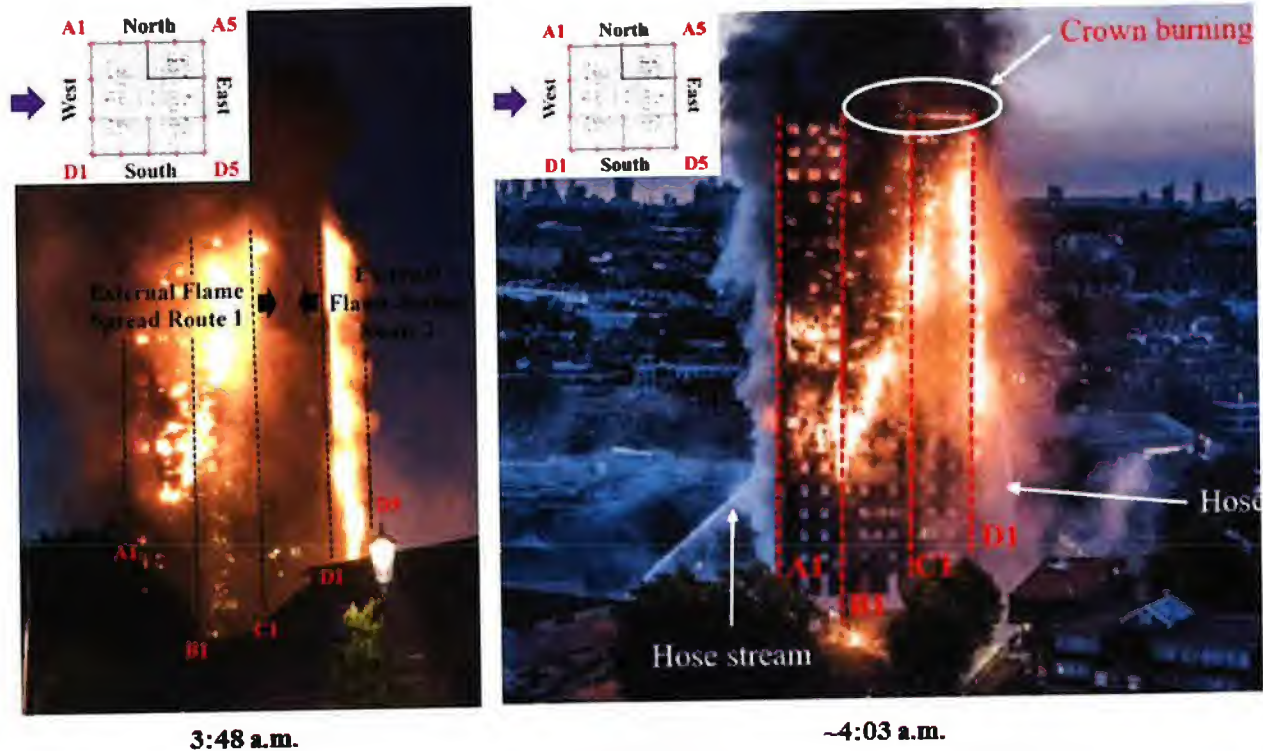


**3:23 a.m.**

295. By 3:48 a.m., Flame Spread Routes 1 and 2 had nearly converged, and all four faces of the Tower were being decimated by the aggressive and deadly blaze.

296. At approximately 4:03 a.m., Flame Spread Routes 1 and 2 had completely converged and the North, South, East, and West faces of the Tower were engulfed in flames, nearly all of the Flats had internal fires, and the top of the building had caught fire.





297. The fire would not have been able to propagate across and throughout the Tower as quickly and aggressively as it did without the fuel provided by the highly flammable Reynobond PE cladding and Celotex RS5000 PIR Insulation.

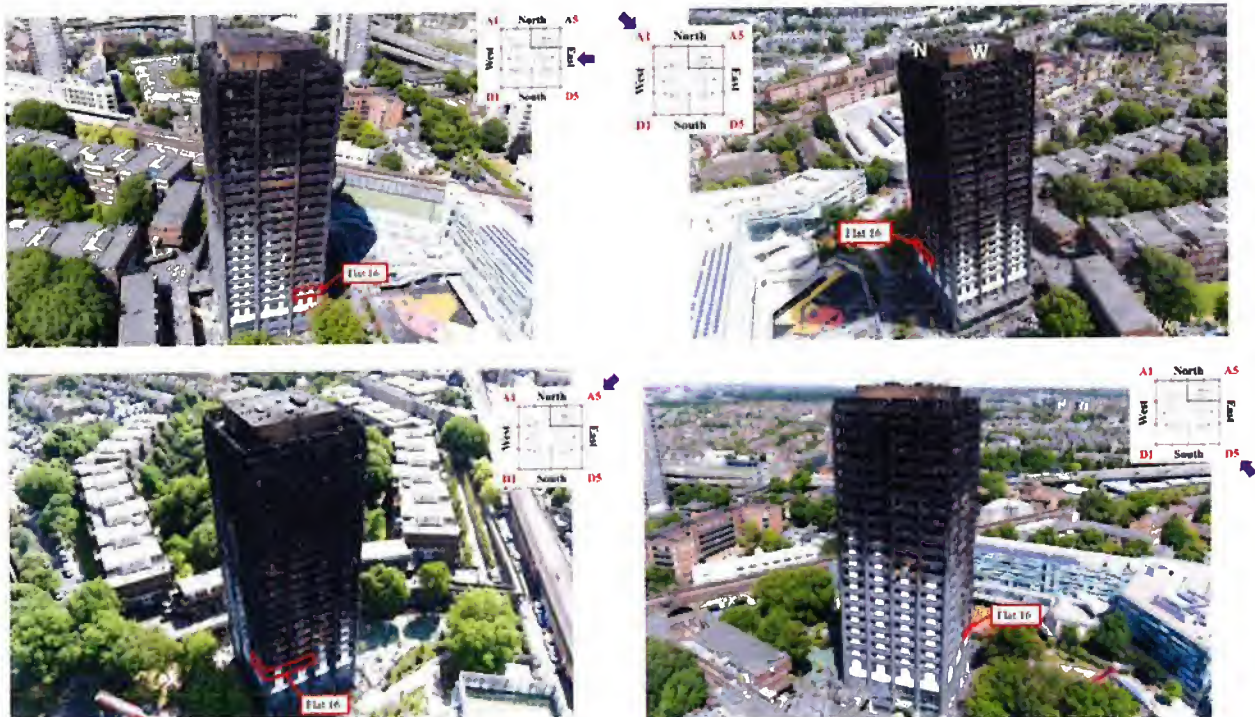
298. The Reynobond PE cladding and Celotex RS5000 provided effectively limitless fuel for the fire, and the ventilation cavity in the cladding system allowed for an abundance of air flow which helped fuel and spread the fire.

299. The extreme flammability of the Reynobond PE cladding panels and the Celotex RS5000 PIR Insulation caused the fire to continuously penetrate back into the Tower and by 9:50 p.m., approximately 22 hours after the fire started, the fire was still raging on inside the Tower.



9:50 p.m.

300. The fire raged for more than sixty (60) hours until firefighters were able to finally extinguish the devastating inferno and, in the wake, stood the charred Grenfell Tower:



301. By the time the fire was fully extinguished, seventy-one (71) people had perished, one (1) would tragically die months later as a result of the horrific injuries sustained in the fire, and scores of residents who were able to escape had suffered catastrophic physical, psychological, and emotional injuries.

### **THE DEFENDANTS' OUTRAGEOUSLY RECKLESS ACTS**

302. All of the Defendants in this case chose to expose the residents of the Grenfell Tower, including Plaintiffs and Plaintiffs' decedents, to the extreme and unreasonable risk of severe injury or death caused by fire, all in the name of corporate profits.

303. Each Defendant chose to supply the United Kingdom and/or specifically the Grenfell Tower with the cheaper, highly flammable versions of their respective products in order to achieve higher profits.

304. Each Defendant knowingly chose profits over the lives of the Grenfell Tower residents.

305. The Arconic Defendants' conscious choice of increased profits over the lives of the Grenfell Tower residents was, upon information and belief, orchestrated by and through the Arconic Defendants' international nucleus of operations, located in Pittsburgh, Pennsylvania.

306. The Whirlpool Defendant's choice to expose residents of the United Kingdom to the foreseeable and extreme risk of fire by selling fridge-freezers with plastic casing instead of the metal casing required in the United States, was made through the Whirlpool Defendant's headquarters located in Benton Harbor, Michigan.

307. Defendant Celotex's decision to supply insulation known to be extremely flammable for use in a tower Defendant Celotex knew to be over 200 feet tall was made by and

through Defendant Celotex's North American headquarters and nucleus of operations, located in Malvern, Pennsylvania.

**I. THE ARCONIC DEFENDANTS**

**308.** The Arconic Defendants knowingly placed lives at risk when it supplied its highly flammable Reynobond PE cladding to Grenfell Tower despite *knowing* that the Reynobond PE cladding was unfit for the Tower and posed a dangerous fire hazard.

**309.** When deciding what cladding is to be supplied to buildings, the paramount concern and consideration must be the safety of the men, women and children living in the building.

**310.** Reynobond PE cladding should never be used in buildings over 40 feet high because should a fire break out and ignite the highly flammable polyethylene core and insulation, as it did at the Grenfell Tower, the maximum reach of a firefighter's fully extended ladder is approximately 40 feet.

**311.** Prior to this tragedy, the Arconic Defendants acknowledged and specifically warned consumers that its cladding presented a substantial fire risk and that, "[a]nother important rule when it comes to the height of buildings concerns the accessibility of the fire brigade to the fire in the building: **as soon as the building is higher than the firefighters' ladders, it has to be conceived with an incombustible material.**"



## Fire is a key issue when it comes to buildings

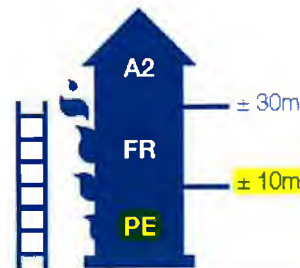
When conceiving a building, it is crucial to choose the adapted products in order to avoid the fire to spread to the whole building. Especially when it comes to facades and roofs, the fire can spread extremely rapidly.

Important to take the "fire characteristic" into account when starting the construction or refurbishment of a building in order to protect the people and assets while limiting fire propagation. It is especially crucial for public establishments such as hospitals, schools, offices, etc.

Buildings are also classified according to their height and destination (public buildings, industrial buildings, housings...): it will also define which materials are safer to use. Another important rule when it comes to the height of buildings concerns the accessibility of the fire brigade to the fire in the building: as soon as the building is higher than the firefighters' ladders, it has to be conceived with an incombustible material.



In order to appear and spread, fire needs three elements: heat source, combustion agent (usually oxygen) and fuel.



As soon as the building is higher than the firefighters' ladders, it has to be conceived with an incombustible material.

312. The Arconic Defendants unquestionably knew that its Reynobond PE cladding must never be used in buildings greater than 40 feet high because it created a substantial risk of harm.

313. Grenfell Tower was approximately 220 feet tall.

314. Reynobond PE cladding was completely unfit for the Tower.

315. The Arconic Defendants' had direct knowledge that the Tower was much greater than 40 feet high.

316. Upon information and belief, the Arconic Defendants' order acknowledgments and purchase orders confirm the total area of Reynobond 55 PE 4mm Smoke Silver Metallic

E9107S DG 5000 Washcoat—the Reynobond PE cladding utilized on all floors from 4 upwards—being delivered to the Grenfell Tower was 6,586 m<sup>2</sup>.

**317.** Based on the total area of Reynobond PE the Arconic Defendants knowingly supplied to the Grenfell Tower, there is absolutely no question the Arconic Defendants knew that the Grenfell Tower was greater than 40 feet tall and thus wholly unfit to be encased in Reynobond PE cladding.

**318.** All strategic business plans, both foreign and domestic, for the Arconic Defendants originates from Arconic’s Pennsylvania-based corporate hub.

**319.** A purchase of material of the necessary quantity for the Grenfell Tower, as discussed above, would necessarily receive the attention of the Arconic Defendants’ employees and agents in the United States.

**320.** Knowledge of the specific order of the material for the Grenfell Tower was received by Grenfell’s agents and employees in the United States.

**321.** Knowledge of the specific order of the material for the Grenfell Tower was received by Arconic’s agents and employees in Pennsylvania.

**322.** The Arconic Defendants’ fabrication facilities in Europe take all instruction on design and fabrication from the United States based operations.

**323.** The Arconic Defendants knew that providing Reynobond PE cladding to the Tower presented an extreme and grave risk of harm to people living in the Tower.

**324.** The Arconic Defendants knew of the dangers of Reynobond PE and its dangerous propensity to rapidly propagate any fire prior to the date of the fire by virtue of testing which occurred in the United States.

**325.** Upon information and belief, the fire resistance testing of the Reynobond PE took place in Pennsylvania and Georgia demonstrated the propensities of Reynobond PE to rapidly propagate any fire.

**326.** Testing done for the Arconic Defendants by ICC-ES confirmed that Reynobond PE was flammable and should not be installed in any building above 40 feet pursuant to the limitations of the IBC and the National Fire Protection Association (“NFPA”).

**327.** Upon information and belief, testing of the Reynobond PE done for Arconic Defendants was performed by Architectural Testing, Inc. and/or Intertek, in Pennsylvania.

**328.** Through the aforementioned testing, the Arconic Defendants unquestionably knew that its Reynobond PE cladding did not comply with NFPA 285 and that the Reynobond PE cladding must never be used in buildings greater than 40 feet high because it created a substantial risk of harm.

**329.** Despite this knowledge, The Arconic Defendants, through their personnel located in the Arconic Defendants’ international nucleus of operations in Pittsburgh, Pennsylvania, decided to recklessly ignore the safety of the hundreds of people that lived in the Tower by cutting corners to save money and increase profits, and provided the defective Reynobond PE cladding to the Tower.

**330.** Upon information and belief, the Arconic Defendants’ Reynobond PE is cheaper for the Arconic Defendants to manufacture and produce and sales of the Reynobond PE inure greater profits to the Arconic Defendants.

**331.** The Arconic Defendants knew that the United States market for Reynobond PE was significantly limited given that the United States would not allow the Reynobond PE to be installed on any building greater than 40 feet in height.

**332.** As a result, the Arconic Defendants sought to peddle their highly flammable and dangerously defective Reynobond PE in Europe, specifically in the United Kingdom.

**333.** At all times relevant hereto, the decisions made by the Arconic Defendants to knowingly supply the flammable Reynobond PE cladding to the Tower were orchestrated, made and carried out through the Arconic Defendants' headquarters in Pittsburgh, Pennsylvania and was in defiance of the safety information learned by the US testing of its product.

**334.** The Arconic Defendants had an unquestionable and nondelegable duty to provide a product free from dangerous defects.

**335.** The Arconic Defendants egregiously failed to abide by their duty.

**336.** The Arconic Defendants chose to place profits over people and knowingly exposed the Tower's residents to risks with catastrophic consequences.

**337.** The Arconic Defendants' corporate-greed-driven actions, orchestrated and carried out from its headquarters in Pittsburgh, Pennsylvania, resulted in seventy-two (72) deaths and the unimaginable physical, psychological, and emotional suffering of those who escaped the fire.

**338.** The Arconic Defendants failed to warn their costumers and/or the public or construction industry concerning the dangerous associated with their product with they knew or should have known about.

**339.** The Arconic Defendants' conduct, as described above, demonstrated a willful and wanton disregard for the safety and health of the Grenfell Tower residents, Plaintiffs and their decedents.



## **II. DEFENDANT CELOTEX**

**340.** Defendant Celotex, knew that its RS5000 PIR Insulation was highly combustible, dangerously flammable, noncompliant with applicable regulations, and completely unfit for use in the Grenfell Tower.

**341.** Defendant Celotex knew that its RS5000 PIR Insulation would emit toxic fumes if burned.

**342.** Defendant Celotex knew that use of its RS5000 PIR Insulation in exterior building cladding installed on buildings greater than forty feet (40 ft.) tall posed a significant and substantial risk of harm to the people living in any such building due to the highly combustible and dangerously flammable propensity of its Insulation, as well as the exceedingly dangerous propensity to release toxic fumes if ignited.

**343.** Outrageously, Defendant Celotex knowingly falsified and doctored testing performed on its RS5000 PIR Insulation in order to falsely claim that the Insulation was more fire resistant than it actually was.

**344.** Upon information and belief, the Celotex Defendant added a fire-retardant element and/or component to the RS5000 Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification.

**345.** Defendant Celotex unquestionably knew that adding a fire-retardant element and/or component to the RS5000 Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification presented an unreasonable and outrageous risk of

severe injury and/or death to the public and residents of buildings encased with the RS5000 Insulation, including Plaintiff's decedent.

**346.** Upon information and belief, Defendant Celotex's heinous decision to add a fire-retardant element and/or component to the RS5000 Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification was orchestrated, controlled, demanded, and/or overseen by Defendant Celotex's headquarters in Malvern, Pennsylvania, United States.

**347.** The decision to add a fire-retardant element and/or component to the RS5000 Insulation solely to deceive and/or falsify the safety certification, safety testing and/or fire testing but sell its RS5000 without said fire retardant element and/or component is obscenely outrageous, willful and wanton conduct that knowingly placed the health and safety of the members of the public and residents of the Grenfell Tower in jeopardy.

**348.** The RS5000 PIR Insulation was noncompliant with ADB 2013 and the functional requirement of B4(1) of the Building Regulations 2010 at the time of its installation in that it was incapable of adequately resisting the spread of fire.

**349.** Upon information and belief, Defendant Celotex knew that the RS5000 Insulation was unfit for the Tower.

**350.** Despite this knowledge, Defendant Celotex supplied the Insulation to the Grenfell Tower.

**351.** Upon information and belief, the decision to supply the Grenfell Tower with RS5000 PIR Insulation despite knowledge that the Insulation was dangerously unfit for the Tower was orchestrated, controlled, demanded, and/or overseen by Defendant Celotex's headquarters in Malvern, Pennsylvania, United States.

**352.** Defendant Celotex made fraudulent misrepresentations of material fact regarding the safety certification, safety testing and/or fire testing of its RS5000, which Defendant Celotex intended the public and specifically the residents of the Grenfell Tower, including Plaintiffs, to rely upon.

**353.** Defendant Celotex made fraudulent misrepresentations of material fact regarding the safety and fitness of its RS5000 for use on the Grenfell Tower, which Defendant Celotex intended the public and specifically the residents of the Grenfell Tower, including Plaintiffs, to rely upon.

**354.** The residents of the Grenfell Tower relied upon the aforementioned fraudulent misrepresentations of material fact made by Defendant Celotex.

**355.** Defendant Celotex also knew that its RS5000 Insulation, if burned, would release dangerous and toxic cyanide fumes.

**356.** Despite this knowledge, Defendant Celotex knowingly supplied its dangerously defective RS5000 Insulation for use on the Grenfell Tower.

**357.** Defendant Celotex supplied dangerously defective and highly flammable RS5000 Insulation despite knowing that hundreds of people within the Grenfell Tower would be relying on Celotex to provide a product that was free from dangerous defects.

**358.** Defendant Celotex, in an act of corporate greed, placed its profits over the health and safety of the men, women and children living in the Grenfell Tower who relied on Celotex to provide a safe product.

**359.** The Celotex Defendants failed to warn their constomers and/or the public or construction industry concerning the dangerous associated with their product with they knew or should have known about.

**360.** Defendant Celotex's conduct, as described above, demonstrated a willful and wanton disregard for the safety and health of the Grenfell Tower residents, including Plaintiffs and their decedents.

### **III. DEFENDANT WHIRLPOOL**

**361.** The defective Whirlpool Fridge-Freezer that started the deadly fire was made even more dangerous by virtue of its flammable plastic casing.

**362.** Using the plastic casing instead of the metal casing on the fridge-freezer results in no functional or practical benefit and the use of plastic casing is intended only to reduce Defendant Whirlpool's manufacturing costs.

**363.** Upon information and belief, Defendant Whirlpool knew that its plastic casing fridge-freezers, including the subject Fridge-Freezer, were flammable and would act to propagate a fire.

**364.** Upon information and belief, Defendant Whirlpool knew that use of metal casings on fridge-freezers, such as those that must be sold in the United States, has specific fire safety properties that act to contain any fire within the confines of the fridge-freezer.

**365.** There are regulations in the United States which prohibit Defendant Whirlpool from selling the plastic casing fridge-freezers, such as the Model FF175BP.

**366.** Specifically, the UL 250 standard for Household Refrigerators and Freezers requires Enclosures on all refrigeration appliances, such as the Model FF175BP, to be made of a material which "prevents propagation of flame due to electrical disturbances occurring within."

**367.** The UL 250 also requires that the parts used in refrigeration appliances, such as the Model FF175BP, "not support combustion for more than 60 seconds after the fifth application of the test flame, nor shall it be destroyed to such an extent as to: a) reduce electrical

spacings below those specified in Clauses 6.1 and 6.2; and b) expose uninsulated live parts in line-voltage circuits as determined by the requirements for assembly, Clause 4.5.”

**368.** Despite this aforementioned knowledge, Defendant Whirlpool continued to sell its plastic casing fridge-freezers, including the subject Fridge-Freezer, in the United Kingdom.

**369.** Prior to the date of the fire, Defendant Whirlpool had direct knowledge that the FF175BP fridge-freezer was susceptible to causing fires.

**370.** Prior to the date of the fire, Defendant Whirlpool was explicitly notified of five (5) reported fires in the FF175BP fridge-freezer, which occurred on September 26, 2011, March 28, 2013, September 5, 2013, October 31, 2014, and June 25, 2015.

**371.** This knowledge was or should have been supplied to the United States based Whirlpool headquarters.

**372.** Whirlpool did nothing to notify purchasers, users, or the public at large of the dangers associated with their product which they came to be aware of and failed to recall the product.

**373.** Thus, prior to the fire at the Grenfell Tower which killed 72 people and devastatingly injured scores of people, Defendant Whirlpool had direct knowledge that FF175BP fridge-freezers that were alleged to be manufactured in October, 2008, just as the subject Fridge-Freezer was, were defective and susceptible to bursting into flames.

**374.** Defendant Whirlpool’s aforementioned actions knowingly placed the lives of Grenfell Tower residents in grave danger, and there were catastrophic consequences.

**375.** Defendant Whirlpool’s actions were a willful and wanton display of reckless disregard to the health and safety of Plaintiffs and Plaintiffs’ decedents.

376. The Whirlpool Defendants failed to warn their constomers and/or the public or construction industry concerning the dangerous associated with their product with they knew or should have known about.

377. The Courts of the United States have an interest in regulating the conduct of United States based companies including Whirlpool, Arconic and Celotex.

378. The Courts of Pennsylvania specifically have an interest in regulating the conduct of corporations who avail themselves of Pennsylvania laws, choose to headquarter in Pennsylvania, and operate their principal place of business out of Pennsylvania.

**INJURIES AND DAMAGES – DECEDENTS, ESTATES AND BENEFICIARIES**

379. As a direct and proximate result of the Defendants strict products liability, outrageously willful and wanton conduct, and punitive conduct, all decedents named herein suffered serious, severe, disabling injuries including, but not limited to, their excruciating deaths and conscious pain and suffer, resulting from being burned alive and inhalation of smoke, super-heated air, and toxic fumes.

380. As a direct and proximate result of the Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, which resulted in the death of all decedents named herein, all decedents' beneficiaries and Estates have in the past and will in the future continue to suffer great loss, including, but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

381. As a direct and proximate result of the foregoing, all named decedents' wrongful death beneficiaries and Estates incurred or have been caused to incur puciniary loss including but

not limited to loss of future earning capacity and various expenses for various funeral, burial, and estate and administration expenses for which Plaintiff is entitled to compensation.

382. As a direct and proximate result of the Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff claims damages suffered by the above-captioned Estates by reason of the death of decedents, including, without limiting the generality thereof, the following: severe injuries to each respective decedent which resulted in their deaths; the anxiety, horror, fear of impending death, mental disturbance, pain, suffering, emotional distress from witnessing deaths and injuries to loved ones and other intangible losses which each decedent suffered prior to their death; the loss of future earning capacity suffered by each decedent from the date of their death until the time in the future that the particular decedent would have lived had the decedent not died as a result of the injuries they sustained; and the loss and total limitation and deprivation of each decedent's normal activities, pursuits and pleasures from the date of their death until such time in the future as the particular decedent would have lived had they not died as a result of the injuries sustained by reason of the strict products liability, outrageously willful and wanton conduct, and punitive conduct of Defendants.

383. The purpose of these wrongful death and survival claims is to fully assert all claims for damages recoverable in Pennsylvania on behalf of Estates, decedents, and beneficiaries, which are available for actions sounding in products liability and punitive damages and to the extent specific claims are inadvertently omitted on behalf of any plaintiff, the right of amendment is hereby preserved.

384. To the extent any beneficiaries are unknown or unidentified or any issues exist with the opening of any estates, all claims on behalf of all estates, decedents and beneficiaries remain preserved.

#### INJURIES AND DAMAGES - SURVIVORS

385. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ahmed Abdel-Rasoul was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Ahmed Abdel-Rasoul has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Ahmed Abdel-Rasoul has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Ahmed Abdel-Rasoul, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Ahmed Abdel-Rasoul has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ahmed Abdel-Rasoul, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ahmed Abdel-Rasoul, has in the past and continue to suffer pain, disfigurement, scarring,



loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Ahmed Abdel-Rasoul, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**386.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mustafa Abdu, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mustafa Abdu, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mustafa Abdu, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mustafa Abdu, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mustafa Abdu, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mustafa Abdu, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mustafa Abdu, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mustafa Abdu, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**387.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sabah Abdullah, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sabah Abdullah, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sabah Abdullah, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sabah Abdullah, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sabah Abdullah, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sabah Abdullah, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations,

treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sabah Abdullah, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sabah Abdullah, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**388.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdul-Wahab Abdulhamid, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Abdul-Wahab Abdulhamid has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Abdul-Wahab Abdulhamid has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Abdul-Wahab Abdulhamid has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Abdul-Wahab Abdulhamid has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdul-Wahab Abdulhamid has in the past required, continue to require, and may in the

future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdul-Wahab Abdulhamid has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdul-Wahab Abdulhamid, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**389.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maryam Adam, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Maryam Adam, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Maryam Adam, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Maryam Adam, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Maryam Adam, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maryam Adam, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maryam Adam, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maryam Adam, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**390.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abraham Abebe, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Abraham Abebe, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Abraham Abebe, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Abraham Abebe, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Abraham Abebe, has in the past and may in the future continue to be disabled

from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abraham Abebe, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abraham Abebe, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abraham Abebe, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**391.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Turufat Yilma Girma, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Turufat Yilma Girma, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Turufat Yilma Girma, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Turufat Yilma Girma, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and

emotional anguish. Plaintiff, Turufat Yilma Girma, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Turufat Yilma Girma, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Turufat Yilma Girma, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Turufat Yilma Girma, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**392.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and

incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

393. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Karen Aboud, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Karen Aboud, has in the past and may in the



future require medicines, medical care and treatment. Plaintiff, Karen Aboud, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Karen Aboud, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Karen Aboud, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Karen Aboud, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Karen Aboud, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Karen Aboud, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**394.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may

in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**395.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

396. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elsa Afeworki, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Elsa Afeworki, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Elsa Afeworki, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Elsa Afeworki, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Elsa Afeworki, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elsa Afeworki, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elsa Afeworki, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life; and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elsa Afeworki, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**397.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohamed Ahmed, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,

smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mohamed Ahmed, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mohamed Ahmed, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mohamed Ahmed, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mohamed Ahmed, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohamed Ahmed, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohamed Ahmed, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohamed Ahmed, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

398. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Randa Al-Arasi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Randa Al-Arasi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Randa Al-Arasi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Randa Al-Arasi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Randa Al-Arasi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Randa Al-Arasi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Randa Al-Arasi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Randa Al-Arasi, has been prevented and will be prevented in the future from performing

their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

399. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

400. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions



on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

401. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fadumo Ahmed, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Fadumo Ahmed, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Fadumo Ahmed, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Fadumo Ahmed, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Fadumo Ahmed, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fadumo Ahmed, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fadumo

Ahmed, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fadumo Ahmed, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

402. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Khalid Ahmed, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Khalid Ahmed, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Khalid Ahmed, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Khalid Ahmed, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Khalid Ahmed, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Khalid Ahmed, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment,

future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Khalid Ahmed, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Khalid Ahmed, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**403.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Omar Alhaj Ali, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Omar Alhaj Ali, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Omar Alhaj Ali, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Omar Alhaj Ali, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Omar Alhaj Ali, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Omar Alhaj Ali, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Omar Alhaj Ali, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Omar Alhaj Ali, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

404. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria de Fatima Alves, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Maria de Fatima Alves, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Maria de Fatima Alves, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Maria de Fatima Alves, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Maria de Fatima Alves, has in the past and may in the future

continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria de Fatima Alves, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria de Fatima Alves, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria de Fatima Alves, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**405.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Manuel Miguel Alves, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Manuel Miguel Alves, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Manuel Miguel Alves, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Manuel Miguel Alves, has in

the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Manuel Miguel Alves, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Manuel Miguel Alves, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Manuel Miguel Alves, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Manuel Miguel Alves, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

406. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ines Tavares Alves, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Ines Tavares Alves, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Ines Tavares Alves, has in

the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Ines Tavares Alves, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Ines Tavares Alves, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ines Tavares Alves, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ines Tavares Alves, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ines Tavares Alves, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

407. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Tiago Alves, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full



extent of which has yet to be determined. Plaintiff, Tiago Alves, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Tiago Alves, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Tiago Alves, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Tiago Alves, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Tiago Alves, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Tiago Alves, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Tiago Alves, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

408. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Araya, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Meron Araya, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Meron Araya, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Meron Araya, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Meron Araya, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Araya, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Araya, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Araya, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

409. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ethiopia Assefa, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a

dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Ethiopia Assefa, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Ethiopia Assefa, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Ethiopia Assefa, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Ethiopia Assefa, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ethiopia Assefa, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ethiopia Assefa, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ethiopia Assefa, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

410. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sied Bayan, was forced

to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sied Bayan, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sied Bayan, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sied Bayan, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sied Bayan, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sied Bayan, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sied Bayan, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sied Bayan, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

411. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Yousef, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Nadia Yousef, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Nadia Yousef, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Nadia Yousef, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Nadia Yousef, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Yousef, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Yousef, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Yousef, has been prevented and will be prevented in the future from performing

their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

412. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, John Beadle, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, John Beadle, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, John Beadle, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, John Beadle, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, John Beadle, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, John Beadle, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, John Beadle, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, John Beadle, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

413. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear,



loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**414.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elpidio Bonifacio, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Elpidio Bonifacio, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Elpidio Bonifacio, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Elpidio Bonifacio, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Elpidio Bonifacio, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elpidio Bonifacio, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elpidio Bonifacio, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elpidio Bonifacio, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**415.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nicholas Burton, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Nicholas Burton, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Nicholas Burton, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Nicholas Burton, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Nicholas Burton, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nicholas Burton, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue

presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nicholas Burton, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nicholas Burton, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**416.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Virgilio Castro, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Virgilio Castro, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Virgilio Castro, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Virgilio Castro, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Virgilio Castro, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Virgilio Castro, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Virgilio Castro, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Virgilio Castro, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**417.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ann Chance, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Ann Chance, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Ann Chance, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Ann Chance, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Ann Chance, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ann Chance, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ann Chance, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ann Chance, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**418.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chia-Yuan Naomi Li, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Chia-Yuan Naomi Li, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Chia-Yuan Naomi Li, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Chia-Yuan Naomi Li, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Chia-Yuan Naomi Li, has in the past and may in the future

continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chia-Yuan Naomi Li, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chia-Yuan Naomi Li, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chia-Yuan Naomi Li, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

419. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED],

has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**420.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Salah Eddine Chebiouni, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Salah Eddine Chebiouni, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Salah

Eddine Chebiouni, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Salah Eddine Chebiouni, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Salah Eddine Chebiouni, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Salah Eddine Chebiouni, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Salah Eddine Chebiouni, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Salah Eddine Chebiouni, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**421.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Zak Chebiouni, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full



extent of which has yet to be determined. Plaintiff, Zak Chebiouni, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Zak Chebiouni, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Zak Chebiouni, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Zak Chebiouni, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Zak Chebiouni, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Zak Chebiouni, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Zak Chebiouni, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**422.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fung-Hee Cheung, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a

dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Fung-Hee Cheung, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Fung-Hee Cheung, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Fung-Hee Cheung, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Fung-Hee Cheung, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fung-Hee Cheung, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fung-Hee Cheung, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fung-Hee Cheung, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

423. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chin-Hsuan Lydia

Liao, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Chin-Hsuan Lydia Liao, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Chin-Hsuan Lydia Liao, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Chin-Hsuan Lydia Liao, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Chin-Hsuan Lydia Liao, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chin-Hsuan Lydia Liao, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chin-Hsuan Lydia Liao, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chin-Hsuan Lydia Liao, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

424. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Costa Coteló, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Jose Costa Coteló, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Jose Costa Coteló, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Jose Costa Coteló, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Jose Costa Coteló, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Costa Coteló, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Costa Coteló, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Costa Coteló, has been prevented and will be prevented in the future from

performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**425.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Dorinda Suarez Chan, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Dorinda Suarez Chan, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Dorinda Suarez Chan, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Dorinda Suarez Chan, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Dorinda Suarez Chan, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Dorinda Suarez Chan, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Dorinda Suarez Chan, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Dorinda Suarez Chan, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**426.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Katarzyna Dabrowska, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Katarzyna Dabrowska, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Katarzyna Dabrowska, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Katarzyna Dabrowska, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Katarzyna Dabrowska, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Katarzyna Dabrowska, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Katarzyna Dabrowska, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear,

loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Katarzyna Dabrowska, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**427.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Roy Smith, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Roy Smith, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Roy Smith, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Roy Smith, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Roy Smith, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Roy Smith, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Roy

Smith, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Roy Smith, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**428.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care,



hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

429. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future

require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

430. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Edward Daffarn, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Edward Daffarn, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Edward Daffarn, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Edward Daffarn, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Edward Daffarn, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Edward Daffarn, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Edward Daffarn, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Edward Daffarn, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**431.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sam Daniels, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sam Daniels, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sam Daniels, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sam Daniels, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sam Daniels, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sam Daniels, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sam Daniels, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sam Daniels, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

432. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hiwot Dagnachew, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Hiwot Dagnachew, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Hiwot Dagnachew, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Hiwot Dagnachew, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Hiwot Dagnachew, has in the past and may in the future continue to be

disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hiwot Dagnachew, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hiwot Dagnachew, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hiwot Dagnachew, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**433.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wintom Temesgen, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Wintom Temesgen, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Wintom Temesgen, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Wintom Temesgen, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional

anguish. Plaintiff, Wintom Temesgen, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wintom Temesgen, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wintom Temesgen, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wintom Temesgen, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

434. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED],

has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

435. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur

further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

436. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alemishet Demissie, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Alemishet Demissie, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Alemishet Demissie, has in



the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Alemishet Demissie, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Alemishet Demissie, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alemishet Demissie, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alemishet Demissie, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alemishet Demissie, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

437. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Petra Doulova, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Petra Doulova, has in the past and may in the

future require medicines, medical care and treatment. Plaintiff, Petra Doulova, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Petra Doulova, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Petra Doulova, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Petra Doulova, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Petra Doulova, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Petra Doulova, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**438.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Leroy Augustus, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Leroy Augustus, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Leroy Augustus, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Leroy Augustus, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Leroy Augustus, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Leroy Augustus, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Leroy Augustus, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Leroy Augustus, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

439. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rabia Yahya, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rabia Yahya, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Rabia Yahya, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rabia Yahya, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rabia Yahya, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rabia Yahya, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations; testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rabia Yahya, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rabia Yahya, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**440.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations,

sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

441. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes,

exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

442. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED]

██████████, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, ██████████, has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, ██████████, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, ██████████, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, ██████████, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

443. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from



performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**444.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanan Wahabi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Hanan Wahabi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Hanan Wahabi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Hanan Wahabi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Hanan Wahabi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanan Wahabi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanan Wahabi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanan Wahabi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

445. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions

on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**446.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mouna El-Ogbani, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mouna El-Ogbani, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mouna El-Ogbani, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mouna El-Ogbani, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mouna El-Ogbani, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mouna El-Ogbani, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mouna El-Ogbani, has in the past and continue to suffer pain, disfigurement, scarring,

loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mouna El-Ogbani, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**447.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Youssef Khalloud, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Youssef Khalloud, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Youssef Khalloud, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Youssef Khalloud, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Youssef Khalloud, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Youssef Khalloud, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Youssef Khalloud, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Youssef Khalloud, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

448. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care,

hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

449. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the

future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

450. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

451. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Natasha Elcock, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Natasha Elcock, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Natasha Elcock, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Natasha Elcock, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Natasha Elcock, has in the past and may in the future continue to be disabled



from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Natasha Elcock, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Natasha Elcock, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Natasha Elcock, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**452.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and

psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

453. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Yehualashet Enyew, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Yehualashet Enyew, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Yehualashet Enyew, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Yehualashet Enyew, has in the past

and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Yehualashet Enyew, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Yehualashet Enyew, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Yehualashet Enyew, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Yehualashet Enyew, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**454.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Richard Fletcher, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Richard Fletcher, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Richard Fletcher, has in the past and may in the future continue to be compelled to expend monies and incur further

obligations for such medical care and treatment. Plaintiff, Richard Fletcher, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Richard Fletcher, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Richard Fletcher, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Richard Fletcher, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Richard Fletcher, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

455. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment.

Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment.

Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED]

[REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

456. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hime Gashaw, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Hime Gashaw, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Hime Gashaw, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Hime Gashaw, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Hime Gashaw, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hime Gashaw, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hime Gashaw, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hime Gashaw, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**457.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Helen Gebremeskel, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Helen Gebremeskel, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Helen Gebremeskel, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Helen Gebremeskel, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Helen Gebremeskel, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Helen Gebremeskel, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Helen Gebremeskel, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Helen Gebremeskel, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**458.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a

dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**459.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Clarita Ghavimi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,



smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Clarita Ghavimi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Clarita Ghavimi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Clarita Ghavimi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Clarita Ghavimi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Clarita Ghavimi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Clarita Ghavimi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Clarita Ghavimi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**460.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Marcio Gomes, was

forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Marcio Gomes, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Marcio Gomes, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Marcio Gomes, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Marcio Gomes, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Marcio Gomes, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Marcio Gomes, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Marcio Gomes, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

461. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Andreia Perestrelo, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, injuries resulting in a coma, loss of her child who was 7 months in utero, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Andreia Perestrelo, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Andreia Perestrelo, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Andreia Perestrelo, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Andreia Perestrelo, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Andreia Perestrelo, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Andreia Perestrelo, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Andreia Perestrelo, has been prevented and will be prevented in the future from

performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

462. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

463. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions

on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

464. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Charmaine Greenridge, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Charmaine Greenridge, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Charmaine Greenridge, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Charmaine Greenridge, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Charmaine Greenridge, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Charmaine Greenridge, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Charmaine Greenridge, has in the past and continue to suffer pain, disfigurement,

scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Charmaine Greenridge, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**465.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Daniel Griffin, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Daniel Griffin, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Daniel Griffin, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Daniel Griffin, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Daniel Griffin, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Daniel Griffin, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Daniel Griffin, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Daniel Griffin, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

466. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Haley, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sharon Haley, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sharon Haley, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sharon Haley, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sharon Haley, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Haley, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.



- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Haley, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Haley, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

467. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Lina Hamide, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Lina Hamide, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Lina Hamide, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Lina Hamide, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Lina Hamide, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Lina Hamide, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Lina Hamide, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Lina Hamide, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

468. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, William Thomson, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, William Thomson, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, William Thomson, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, William Thomson, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, William Thomson, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, William Thomson, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations,

treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, William Thomson, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, William Thomson, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**469.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mary Hanley, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mary Hanley, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mary Hanley, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mary Hanley, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mary Hanley, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mary Hanley, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment,

future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mary Hanley, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mary Hanley, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

470. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Catherine Hanley, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Catherine Hanley, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Catherine Hanley, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Catherine Hanley, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Catherine Hanley, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Catherine Hanley, has in the past required, continue to require, and may in the

future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Catherine Hanley, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Catherine Hanley, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

471. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Avni Haxhisefa, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Avni Haxhisefa, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Avni Haxhisefa, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Avni Haxhisefa, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Avni Haxhisefa, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Avni Haxhisefa, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Avni Haxhisefa, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Avni Haxhisefa, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

472. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alk Haxhisefa, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Alk Haxhisefa, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Alk Haxhisefa, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Alk Haxhisefa, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Alk Haxhisefa, has in the past and may in the future continue to be disabled from

performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alk Haxhisefa, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alk Haxhisefa, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alk Haxhisefa, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

473. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional

anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

474. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adriana Zymberaj, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Adriana Zymberaj, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Adriana Zymberaj, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Adriana Zymberaj, has in the past and



may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Adriana Zymberaj, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adriana Zymberaj, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adriana Zymberaj, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adriana Zymberaj, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

475. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further

obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

476. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Makrem Harzi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Makrem Harzi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Makrem Harzi, has in the past

and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Makrem Harzi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Makrem Harzi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Makrem Harzi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Makrem Harzi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Makrem Harzi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

477. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rawda Said, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rawda Said, has in the past and may in the

future require medicines, medical care and treatment. Plaintiff, Rawda Said, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rawda Said, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rawda Said, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rawda Said, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rawda Said, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rawda Said, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**478.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdirahman Salah Hirsi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Abdirahman Salah Hirsi, has in the past and

may in the future require medicines, medical care and treatment. Plaintiff, Abdirahman Salah Hirsi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Abdirahman Salah Hirsi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Abdirahman Salah Hirsi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdirahman Salah Hirsi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdirahman Salah Hirsi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Abdirahman Salah Hirsi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**479.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suhayb Salah Hirsi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Suhayb Salah Hirsi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Suhayb Salah Hirsi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Suhayb Salah Hirsi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Suhayb Salah Hirsi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suhayb Salah Hirsi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suhayb Salah Hirsi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suhayb Salah Hirsi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**480.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Van Quang Ho, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Van Quang Ho, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Van Quang Ho, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Van Quang Ho, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Van Quang Ho, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Van Quang Ho, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Van Quang Ho, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Van Quang Ho, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**481.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hoang Khanh Quang, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a

dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Hoang Khanh Quang, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Hoang Khanh Quang, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Hoang Khanh Quang, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Hoang Khanh Quang, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hoang Khanh Quang, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hoang Khanh Quang, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hoang Khanh Quang, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**482.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eduardo Ignacio, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,



smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Eduardo Ignacio, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Eduardo Ignacio, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Eduardo Ignacio, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Eduardo Ignacio, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eduardo Ignacio, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eduardo Ignacio, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eduardo Ignacio, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**483.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Erlinda Ignacio, was

forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Erlinda Ignacio, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Erlinda Ignacio, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Erlinda Ignacio, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Erlinda Ignacio, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Erlinda Ignacio, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Erlinda Ignacio, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Erlinda Ignacio, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**484.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wesley Ignacio, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Wesley Ignacio, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Wesley Ignacio, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Wesley Ignacio, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Wesley Ignacio, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wesley Ignacio, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wesley Ignacio, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Wesley Ignacio, has been prevented and will be prevented in the future from performing

their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

485. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Madylyn Ignacio, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Madylyn Ignacio, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Madylyn Ignacio, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Madylyn Ignacio, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Madylyn Ignacio, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Madylyn Ignacio, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Madylyn Ignacio, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Madylyn Ignacio, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

486. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions

on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

487. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Jafari, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Nadia Jafari, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Nadia Jafari, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Nadia Jafari, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Nadia Jafari, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Jafari, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Jafari, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their

ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nadia Jafari, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**488.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fatima Jafari, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Fatima Jafari, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Fatima Jafari, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Fatima Jafari, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Fatima Jafari, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fatima Jafari, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fatima Jafari, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their

ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Fatima Jafari, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**489.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria Jafari, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Maria Jafari, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Maria Jafari, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Maria Jafari, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Maria Jafari, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria Jafari, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria Jafari, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their



ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Maria Jafari, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**490.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Joseph John, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Joseph John, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Joseph John, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Joseph John, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Joseph John, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Joseph John, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Joseph John, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their

ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Joseph John, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

491. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**492.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Corrine Jones, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Corrine Jones, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Corrine Jones, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Corrine Jones, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Corrine Jones, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Corrine Jones, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment,

future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Corrine Jones, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Corrine Jones, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

493. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future

require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**494.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**495.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Behailue Gobena Kebede, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Behailue Gobena Kebede, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Behailue Gobena Kebede, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Behailue Gobena Kebede, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Behailue Gobena Kebede, has in the past and

may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Behailue Gobena Kebede, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Behailue Gobena Kebede, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Behailue Gobena Kebede, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**496.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farshid Kaficheraghi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Farshid Kaficheraghi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Farshid Kaficheraghi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Farshid Kaficheraghi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and

emotional anguish. Plaintiff, Farshid Kaficheraghi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farshid Kaficheraghi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farshid Kaficheraghi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farshid Kaficheraghi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

497. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Milad Kareem, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Milad Kareem, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Milad Kareem, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Milad Kareem, has in the past and may in the



future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Milad Kareem, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Milad Kareem, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Milad Kareem, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Milad Kareem, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**498.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Betty Kasote, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Betty Kasote, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Betty Kasote, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for

such medical care and treatment. Plaintiff, Betty Kasote, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Betty Kasote, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Betty Kasote, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Betty Kasote, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Betty Kasote, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

499. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mesrob Kassemajian, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mesrob Kassemajian, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mesrob Kassemajian, has in the past and may in the future continue to be compelled to expend monies and incur

further obligations for such medical care and treatment. Plaintiff, Mesrob Kassemjdian, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mesrob Kassemjdian, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mesrob Kassemjdian, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mesrob Kassemjdian, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mesrob Kassemjdian, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

500. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the

past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

501. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Laci, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sharon Laci, has in the past and may in the

future require medicines, medical care and treatment. Plaintiff, Sharon Laci, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sharon Laci, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sharon Laci, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Laci, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Laci, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sharon Laci, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**502.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Monica Lokko, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Monica Lokko, has in the past and may in

the future require medicines, medical care and treatment. Plaintiff, Monica Lokko, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Monica Lokko, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Monica Lokko, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Monica Lokko, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Monica Lokko, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Monica Lokko, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**503.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, David Lewis, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, David Lewis, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, David Lewis, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, David Lewis, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, David Lewis, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, David Lewis, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, David Lewis, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, David Lewis, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**504.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Octinia Lewis, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Octinia Lewis, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Octinia Lewis, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Octinia Lewis, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Octinia Lewis, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Octinia Lewis, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Octinia Lewis, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Octinia Lewis, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**505.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Miran Lovsin, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,



orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Miran Lovsin, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Miran Lovsin, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Miran Lovsin, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Miran Lovsin, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Miran Lovsin, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Miran Lovsin, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Miran Lovsin, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**506.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suzana Lovsin, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Suzana Lovsin, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Suzana Lovsin, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Suzana Lovsin, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Suzana Lovsin, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suzana Lovsin, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suzana Lovsin, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Suzana Lovsin, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

507. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Branislav Lukic, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a

dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Branislav Lukic, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Branislav Lukic, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Branislav Lukic, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Branislav Lukic, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Branislav Lukic, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Branislav Lukic, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Branislav Lukic, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

508. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanife Macit, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,

smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Hanife Macit, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Hanife Macit, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Hanife Macit, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Hanife Macit, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanife Macit, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanife Macit, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Hanife Macit, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**509.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sener Macit, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,

smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sener Macit, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sener Macit, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sener Macit, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sener Macit, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sener Macit, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sener Macit, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sener Macit, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**510.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohammed Rasoul, was forced to suffer serious, disabling, and permanent injuries, including but not limited to

burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mohammed Rasoul, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mohammed Rasoul, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mohammed Rasoul, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mohammed Rasoul, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohammed Rasoul, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohammed Rasoul, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mohammed Rasoul, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**511.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Munira Mahmud, was

forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Munira Mahmud, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Munira Mahmud, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Munira Mahmud, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Munira Mahmud, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Munira Mahmud, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Munira Mahmud, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Munira Mahmud, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

512. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff,



██████████, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

513. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, ██████████, has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, ██████████, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, ██████████, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, ██████████, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, ██████████, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

514. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sepideh Minaei Moghaddam, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Sepideh Minaei Moghaddam, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Sepideh Minaei Moghaddam, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Sepideh Minaei Moghaddam, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Sepideh Minaei Moghaddam, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sepideh Minaei Moghaddam, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sepideh Minaei Moghaddam, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions

on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Sepideh Minaei Moghaddam, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**515.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amina Mohamed, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Amina Mohamed, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Amina Mohamed, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Amina Mohamed, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Amina Mohamed, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amina Mohamed, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amina Mohamed, has in the past and continue to suffer pain, disfigurement, scarring,

loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amina Mohamed, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**516.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amna Mohamed, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Amna Mohamed, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Amna Mohamed, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Amna Mohamed, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Amna Mohamed, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amna Mohamed, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amna Mohamed, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Amna Mohamed, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

517. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alison Moses, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Alison Moses, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Alison Moses, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Alison Moses, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Alison Moses, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alison Moses, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment,

future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alison Moses, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Alison Moses, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

518. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nagawa Prossy Nalukwago, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Nagawa Prossy Nalukwago, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Nagawa Prossy Nalukwago, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Nagawa Prossy Nalukwago, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Nagawa Prossy Nalukwago, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nagawa Prossy Nalukwago, has in the past required, continue to require, and may in the

future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nagawa Prossy Nalukwago, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Nagawa Prossy Nalukwago, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**519.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Reshad Naqshbandi, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Reshad Naqshbandi, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Reshad Naqshbandi, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Reshad Naqshbandi, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Reshad Naqshbandi, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Reshad Naqshbandi, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Reshad Naqshbandi, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Reshad Naqshbandi, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**520.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farhad Shekeb Neda, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Farhad Shekeb Neda, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Farhad Shekeb Neda, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Farhad Shekeb Neda, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Farhad Shekeb Neda, has in the past and may in the future continue to be



disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farhad Shekeb Neda, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farhad Shekeb Neda, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Farhad Shekeb Neda, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**521.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shakila Flora Neda, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Shakila Flora Neda, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Shakila Flora Neda, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Shakila Flora Neda, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional

anguish. Plaintiff, Shakila Flora Neda, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shakila Flora Neda, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shakila Flora Neda, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shakila Flora Neda, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**522.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Emma O'Connor, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Emma O'Connor, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Emma O'Connor, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Emma O'Connor, has in the past and

may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Emma O'Connor, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Emma O'Connor, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Emma O'Connor, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Emma O'Connor, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**523.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Luke Towner, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Luke Towner, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Luke Towner, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for

such medical care and treatment. Plaintiff, Luke Towner, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Luke Towner, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Luke Towner, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Luke Towner, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Luke Towner, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**524.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kerry O'Hara, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Kerry O'Hara, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Kerry O'Hara, has in the past and may in the future continue to be compelled to expend monies and incur further obligations

for such medical care and treatment. Plaintiff, Kerry O'Hara, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Kerry O'Hara, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kerry O'Hara, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kerry O'Hara, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kerry O'Hara, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**525.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Gitara Pahlavani, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Gitara Pahlavani, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Gitara Pahlavani, has in the

past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Gitara Pahlavani, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Gitara Pahlavani, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Gitara Pahlavani, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Gitara Pahlavani, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Gitara Pahlavani, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**526.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Paramasivan, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Michael Paramasivan, has in the past and

may in the future require medicines, medical care and treatment. Plaintiff, Michael Paramasivan, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Michael Paramasivan, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Michael Paramasivan, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Paramasivan, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Paramasivan, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Paramasivan, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

527. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chiraag Patel, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Chiraag Patel, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Chiraag Patel, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Chiraag Patel, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Chiraag Patel, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chiraag Patel, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chiraag Patel, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chiraag Patel, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

528. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shantilal Patel, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full



extent of which has yet to be determined. Plaintiff, Shantilal Patel, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Shantilal Patel, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Shantilal Patel, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Shantilal Patel, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shantilal Patel, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shantilal Patel, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Shantilal Patel, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**529.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kiran Patel, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic

injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Kiran Patel, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Kiran Patel, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Kiran Patel, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Kiran Patel, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kiran Patel, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kiran Patel, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Kiran Patel, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

530. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elisa Rabaya, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Elisa Rabaya, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Elisa Rabaya, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Elisa Rabaya, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Elisa Rabaya, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elisa Rabaya, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elisa Rabaya, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elisa Rabaya, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**531.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Aziza Raihani, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Aziza Raihani, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Aziza Raihani, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Aziza Raihani, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Aziza Raihani, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Aziza Raihani, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Aziza Raihani, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Aziza Raihani, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**532.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ramiro Urbano Rodriguez, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes,

exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Ramiro Urbano Rodriguez, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Ramiro Urbano Rodriguez, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Ramiro Urbano Rodriguez, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Ramiro Urbano Rodriguez, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ramiro Urbano Rodriguez, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ramiro Urbano Rodriguez, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Ramiro Urbano Rodriguez, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

533. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rhea Rojo, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke

inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rhea Rojo, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Rhea Rojo, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rhea Rojo, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rhea Rojo, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rhea Rojo, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rhea Rojo, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rhea Rojo, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**534.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Antonio Roncolato, was forced to suffer serious, disabling, and permanent injuries, including but not limited to

burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Antonio Roncolato, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Antonio Roncolato, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Antonio Roncolato, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Antonio Roncolato, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Antonio Roncolato, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Antonio Roncolato, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Antonio Roncolato, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**535.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebecca Ross, was

forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rebecca Ross, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Rebecca Ross, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rebecca Ross, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rebecca Ross, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebecca Ross, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebecca Ross, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebecca Ross, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.



536. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebin Sabir, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rebin Sabir, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Rebin Sabir, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rebin Sabir, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rebin Sabir, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebin Sabir, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebin Sabir, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rebin Sabir, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

537. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Genet Shawo, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Genet Shawo, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Genet Shawo, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Genet Shawo, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Genet Shawo, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Genet Shawo, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Genet Shawo, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Genet Shawo, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

538. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Paulos Tekle, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Paulos Tekle, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Paulos Tekle, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Paulos Tekle, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Paulos Tekle, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Paulos Tekle, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Paulos Tekle, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Paulos Tekle, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

539. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Anthony Smith, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Anthony Smith, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Anthony Smith, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Anthony Smith, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Anthony Smith, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Anthony Smith, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Anthony Smith, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Anthony Smith, has been prevented and will be prevented in the future from

performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**540.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elizabeth Sobieszczak, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Elizabeth Sobieszczak, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Elizabeth Sobieszczak, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Elizabeth Sobieszczak, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Elizabeth Sobieszczak, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elizabeth Sobieszczak, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elizabeth Sobieszczak, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Elizabeth Sobieszczak, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**541.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Sobieszczak, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Michael Sobieszczak, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Michael Sobieszczak, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Michael Sobieszczak, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Michael Sobieszczak, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Sobieszczak, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Sobieszczak, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their

ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Michael Sobieszczak, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**542.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Florentyna Sobieszczak, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Florentyna Sobieszczak, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Florentyna Sobieszczak, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Florentyna Sobieszczak, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Florentyna Sobieszczak, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Florentyna Sobieszczak, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Florentyna Sobieszczak, has in the past and continue to suffer pain, disfigurement,

scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.

- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Florentyna Sobieszczak, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**543.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adam Supareogsanond, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Adam Supareogsanond, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Adam Supareogsanond, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Adam Supareogsanond, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Adam Supareogsanond, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adam Supareogsanond, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.



- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adam Supareogsanond, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Adam Supareogsanond, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**544.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chalalai Supareoksanond, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Chalalai Supareoksanond, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Chalalai Supareoksanond, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Chalalai Supareoksanond, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Chalalai Supareoksanond, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chalalai Supareoksanond, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care,

hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chalalai Supareoksanond, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Chalalai Supareoksanond, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**545.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Waewta Supareogsanond, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Waewta Supareogsanond, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Waewta Supareogsanond, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Waewta Supareogsanond, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Waewta Supareogsanond, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Waewta Supareogsanond, has in the past required, continue to require, and may in the

future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.

- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Waewta Supareogsanond, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Waewta Supareogsanond, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**546.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rita Tankarian, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Rita Tankarian, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Rita Tankarian, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Rita Tankarian, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Rita Tankarian, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rita Tankarian, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rita Tankarian, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Rita Tankarian, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**547.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mariko Toyoshima-Lewis, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Mariko Toyoshima-Lewis, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Mariko Toyoshima-Lewis, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Mariko Toyoshima-Lewis, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Mariko Toyoshima-Lewis, has in the

past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mariko Toyoshima-Lewis, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mariko Toyoshima-Lewis, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Mariko Toyoshima-Lewis, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

548. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to

suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

549. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment.

Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

550. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be

compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**551.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Carmen Vieiro, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Carmen Viero, has in the past and may in the



future require medicines, medical care and treatment. Plaintiff, Carmen Vieiro, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Carmen Vieiro, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Carmen Vieiro, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Carmen Vieiro, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Carmen Vieiro, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct Plaintiff, Carmen Vieiro, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**552.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Vieiro, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of

which has yet to be determined. Plaintiff, Jose Viegro, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Jose Viegro, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Jose Viegro, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Jose Viegro, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Viegro, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Viegro, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Jose Viegro, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**553.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Mekonnen, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full

extent of which has yet to be determined. Plaintiff, Meron Mekonnen, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Meron Mekonnen, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Meron Mekonnen, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Meron Mekonnen, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Mekonnen, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Mekonnen, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Meron Mekonnen, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**554.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains,

orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

555. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns, smoke inhalation, super-heated air inhalation, inhalation of toxic fumes,

exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Minor Plaintiff, [REDACTED], has in the past and may in the future require medicines, medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Minor Plaintiff, [REDACTED], has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Minor Plaintiff, [REDACTED], has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

556. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eamon Zada, was forced to suffer serious, disabling, and permanent injuries, including but not limited to burns,

smoke inhalation, super-heated air inhalation, inhalation of toxic fumes, exposure to a dramatically increased risk of life-threatening conditions, abrasions, lacerations, sprains, strains, orthopedic injuries, neurological injuries, psychological injuries, and emotional distress, the full extent of which has yet to be determined. Plaintiff, Eamon Zada, has in the past and may in the future require medicines, medical care and treatment. Plaintiff, Eamon Zada, has in the past and may in the future continue to be compelled to expend monies and incur further obligations for such medical care and treatment. Plaintiff, Eamon Zada, has in the past and may in the future continue to suffer agonizing aches, pains, and psychological and emotional anguish. Plaintiff, Eamon Zada, has in the past and may in the future continue to be disabled from performing their usual duties, occupations, and avocations, all to Plaintiff's great loss and detriment.

- a. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eamon Zada, has in the past required, continue to require, and may in the future require medical treatment and care, and have in the past, continue presently, and may in the future incur the cost of medicines, medical care, hospitalizations, treatment, future operations, testing, and rehabilitation in an attempt to alleviate and/or cure their respective conditions.
- b. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eamon Zada, has in the past and continue to suffer pain, disfigurement, scarring, loss of independence, mental anguish, humiliation, embarrassment, fear, loss of well-being, inability to enjoy the normal pleasures of life, and restrictions on their ability to engage in normal activities and pleasures of life, and other intangible losses.
- c. As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, Plaintiff, Eamon Zada, has been prevented and will be prevented in the future from performing their respective usual duties, activities, occupations, and avocations and have suffered a loss of earnings and a loss of earning capacity.

**557.** As a direct and proximate result of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, the following Plaintiffs make claims for the loss of consortium and deprivation of their respective spouse's love,

companionship, comfort, attention, society, moral guidance, intellectual strength, and physical assistance, as well as the loss of the assistance and earnings of their respective spouses: Abdul-Wahab Abdulhamid and Maryam Adam, h/w; Abraham Abebe and Turufat Yilma Girma, h/w; Mohamed Ahmed and Randa Al-Arasi, h/w; Maria de Fatima Alves and Manuel Miguel Alves, h/w; Sied Bayan and Nadia Yousef, h/w; Rosita Bonifacio; Lee Chapman; Jose Costa Cotelto and Dorinda Suarez Chans, h/w; Katarzyna Dabrowska and Roy Smith, h/w; Petra Doulova and Leroy Augustus, h/w; Bellal El-Guenuni; Mouna El-Ogbani and Youssef Khalloud, h/w; William Thomson and Mary Hanley, h/w; Eduardo Ignacio and Erlinda Ignacio, h/w; Wesley Ignacio and Madylyn Ignacio, h/w; Miran Lovsin and Duzana Lovsin, h/w; Hanife Macit and Sener Macit, h/w; Mohammed Rasoul and Munira Mahmud, h/w; Makrem Harzi and Rawda Said, h/w; Shantilal Patel and Kiran Patel, h/w; Adriana Ramirez; Paulos Tekle and Genet Shawo, h/w; Elizabeth Sobieszczak and Michael Sobieszczak, h/w; Tesfaye Yohannes; Carmen Vieiro and Jose Vieiro, h/w; Hiwot Dagnachew and Wintom Temesgen, h/w; Hime Gashaw and Richard Fletcher, h/w.

**558.** The Plaintiffs identified in the preceding paragraph shall hereinafter be referred to collectively as the “Consortium Plaintiffs.” It is the intention that for any plaintiff who was in the tower at the time of the fire, a loss of consortium claim is filed on behalf of their spouse.

**559.** To the extent any claim is inadvertently omitted or mischaracterized a right of amendment is reserved.

**560.** Defendants are jointly and severally liable for the injuries and damages alleged herein.

## **COUNT I – PRODUCTS LIABILITY**

**PLAINTIFFS v. ARCONIC, INC., ALCOA INC., ARCONIC ARCHITECTURAL  
PRODUCTS, LLC, JOHN DOES (1-99), ABC CORPORATIONS (1-99) and XYZ  
CORPORATIONS (1-99)**

**561.** Plaintiffs hereby incorporate by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**562.** The Arconic Defendants, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, subsidiaries, sister corporations, parent companies, successor corporations, predecessor corporations, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement (Second) of Torts and the Restatement (Third) of Torts: Product Liability because:

- a. Defendants are engaged in the business of designing, manufacturing, assembling, distributing, selling and/or supplying Reynobond PE cladding;
- b. The Reynobond PE cladding which caused Plaintiffs' deaths and injuries was created, designed, marketed and placed in the general stream of commerce by Defendants;
- c. The Reynobond PE cladding was expected to and did reach users without substantial change in the condition in which it was designed, manufactured, assembled, distributed and/or sold;
- d. The Reynobond PE cladding was designed, manufactured, assembled, distributed and/or sold in the defective condition for the reasons set forth below.

**563.** The Arconic Defendants, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement (Second) of Torts, by:

- a. Designing, assembling, manufacturing, selling, supplying and/or distributing a product in a defective condition;
- b. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that failed to comply with NFPA 285;



- c. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that failed to comply with IBC 1407;
- d. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that failed to comply with ADB 2013;
- e. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that failed to comply with the functional requirements of Section B4(1) of Building Regulations 2010;
- f. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Reynobond PE cladding without a flame-retardant core;
- g. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Reynobond PE cladding with the flammable polyethylene core exposed and susceptible to infiltration of fire and ignition;
- h. Designing, assembling, manufacturing, selling, supplying and/or distributing the a product that was known to be unfit for the purpose for which Defendants supplied the product;
- i. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was unreasonably dangerous to its intended and foreseeable users;
- j. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was not safe for all of its intended and represented purposes;
- k. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety features to protect users of the Reynobond PE cladding, including the residents of Grenfell Tower;
- l. Despite having actual knowledge of prior fires, property damage and serious injuries caused by Reynobond PE cladding, failing to make all the necessary corrections to eliminate the risk of fire and prevent future fires and injuries;
- m. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Reynobond PE cladding, failing to adequately warn users that the Reynobond PE cladding was susceptible to igniting, catching fire and/or accelerating the spread of fire;

- n. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Reynobond PE cladding, failing to incorporate a flame retardant core;
- o. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Reynobond PE cladding, failing to incorporate flame retardant features to prevent ignition, catching fire and/or accelerating the spread of fire;
- p. Designing, assembling, manufacturing, selling, supplying and/or distributing the Reynobond PE cladding with combustible and/or flammable components;
- q. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Reynobond PE cladding, failing to design the subject cladding to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- r. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Reynobond PE cladding, failing to utilize alternative, feasible designs to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- s. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety warnings and/or instructions regarding the possible risks of using the product that may be required;
- t. Failing to recall the defective and dangerous product after hazards and/or other dangerous incidents were discovered;
- u. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks and hazards of which far outweigh any utility or benefit of the product (i.e. in violation of the risk utility test); and
- v. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks or which were unknown or unknowable to the consumer (i.e. in violation of the consumer expectations test).

**564.** By conducting themselves as set forth above, the Arconic Defendants' acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of the fire that caused Plaintiffs' injuries and deaths.

**565.** The Reynobond PE cladding was not equipped at the time it left Defendants' possession and control with every element necessary to make it safe for its reasonably foreseeable uses and reasonably foreseeable misuses.

**566.** By reason of the breach of duties—pursuant to § 402(A) of the Restatement of the Law of Torts (Second)—by the Arconic Defendants, by and through their agents, servants, workmen, contractors, suppliers, distributors and/or employees as aforesaid, Plaintiffs and their decedents were caused to sustain serious and permanent disabling personal injuries resulting in her tragic death as set forth above.

**567.** The safety of the public and the residents that would be exposed to the Arconic Defendants' cladding must come first and be the paramount concern and consideration.

**568.** However, the Arconic Defendants knowingly exposed the public and the innocent residents of Grenfell Tower to the imminent and unreasonable risk of injury and death.

**569.** The Arconic Defendants acted upon their corporate greed and knowingly supplied Reynobond PE cladding to Grenfell Tower, which it unquestionably knew to be much greater than 40 feet and therefore completely unsuited for Reynobond PE cladding.

**570.** The Arconic Defendants knew that Reynobond PE cladding was unfit for the Tower.

**571.** The Arconic Defendants knowingly designed and supplied Reynobond PE cladding when Defendants knew that it was unfit and improper.

**572.** The Arconic Defendants' outrageous and reckless decision to supply Reynobond PE cladding was orchestrated, overseen, and/or controlled from the Arconic Defendants' headquarters in Pittsburgh, Pennsylvania, United States.

**573.** The Arconic Defendants exhibited a willful and wanton disregard for the safety and health of the residents of Grenfell Tower and the public in general.

**574.** The Arconic Defendants made fraudulent misrepresentations of material fact regarding the safety and fitness of its product, the Reynobond PE, for use on the Grenfell Tower, which the Arconic Defendants intended the residents of the Grenfell Tower to rely upon.

**575.** The Arconic Defendants made fraudulent misrepresentations of material fact regarding the fire safety of its product, the Reynobond PE, which the Arconic Defendants intended the residents of the Grenfell Tower to rely upon.

**576.** The residents of the Grenfell Tower relied upon the aforementioned fraudulent misrepresentations of material fact made by the Arconic Defendants.

**577.** The Grenfell Tower residents' reliance on the aforementioned fraudulent misrepresentations made by the Arconic Defendants was a factual cause of the harm suffered by Plaintiff's decedent.

**578.** By reason of the Arconic Defendants willful and wanton disregard for the safety and health of the residents of Grenfell Tower and the general public, Plaintiffs and their decedents were caused to sustain serious and permanent disabling injuries and deaths, as set forth above.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants Arconic, Inc., Alcoa Inc., Arconic Architectural Products, John Does (1-99), ABC Corporations (1-99) and XYZ Corporations (1-99) an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

## **COUNT II – PRODUCTS LIABILITY**

**PLAINTIFFS v. WHIRLPOOL CORPORATION, JOHN DOES (1-99), ABC  
CORPORATIONS (1-99) and XYZ CORPORATIONS (1-99)**

**579.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**580.** Defendant Whirlpool, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, subsidiaries, sister corporations, parent companies, successor corporations, predecessor corporations, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement (Second) of Torts and the Restatement (Third) of Torts: Product Liability because:

- a. Defendants are engaged in the business of designing, manufacturing, assembling, distributing, selling and/or supplying Hotpoint Fridge-Freezers;
- b. The Whirlpool/Hotpoint Fridge-Freezer which caused the Grenfell Tower fire and Plaintiffs' deaths and injuries was created, designed, marketed and placed in the general stream of commerce by Defendant Whirlpool;
- c. The Whirlpool/Hotpoint Fridge-Freezer was expected to and did reach users without substantial change in the condition in which it was designed, manufactured, assembled, distributed and/or sold;
- d. The Whirlpool/Hotpoint Fridge-Freezer was designed, manufactured, assembled, distributed and/or sold in the defective condition for the reasons set forth below.

**581.** Defendant Whirlpool, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement of the Law of Torts (Second), by:

- a. Designing, assembling, manufacturing, selling, supplying and/or distributing a product in a defective condition;
- b. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Fridge-Freezer with a highly flammable plastic casing;

- c. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Fridge-Freezer with a highly flammable plastic casing despite knowing that the metal casing it was required to use while selling in the United States would provide much safer means of fire safety and fire protection;
- d. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Fridge-Freezer with a defective and inadequate crimping connection;
- e. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Fridge-Freezer with a crimping connection which did not prevent the overheating of the crimping connection;
- f. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was unreasonably dangerous to its intended and foreseeable users;
- g. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was not safe for all of its intended and represented purposes;
- h. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety features to protect users of the Fridge-Freezer Model FF175BP;
- i. Despite having actual knowledge of prior fires, property damage and serious injuries caused by Model FF175BP Fridge-Freezers, failing to make all the necessary corrections to eliminate the risk of fire and prevent future fires and injuries;
- j. Despite having actual knowledge that Model FF175BP Fridge-Freezers manufactured in October, 2008, including the subject Fridge-Freezer, were susceptible to short circuiting and causing fires, failing to make all the necessary corrections, recalls, and/or safety notices to eliminate the risk of fire and prevent future fires, injuries, and deaths;
- k. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Model FF175BP Fridge-Freezers, failing to adequately warn users that the Model FF175BP Fridge-Freezer was susceptible to causing fires;
- l. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Model FF175BP Fridge-Freezers, failing to incorporate automatic shut-off devices or other safety devices in the Fridge-Freezers to ensure that fires would not result from electrical shorts, overheating or other causes;

- m. Designing, assembling, manufacturing, selling, supplying and/or distributing the subject Fridge-Freezer with combustible and/or flammable components;
- n. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Model FF175BP Fridge-Freezers, failing to design the subject fridge-freezer to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- o. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by Model FF175BP Fridge-Freezers, failing to utilize alternative, feasible designs to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- p. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety warnings and/or instructions regarding the possible risks of using the product that may be required;
- q. Failing to recall the defective and dangerous product after hazards and/or other dangerous incidents were discovered;
- r. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks and hazards of which far outweigh any utility or benefit of the product (i.e. in violation of the risk utility test); and
- s. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks or which were unknown or unknowable to the consumer (i.e. in violation of the consumer expectations test).

**582.** By conducting itself as set forth above, Defendant Whirlpool's acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of the fire that caused Plaintiffs' deaths and injuries.

**583.** The Whirlpool Fridge-Freezer was not equipped at the time it left Defendant's possession and control with every element necessary to make it safe for its reasonably foreseeable uses and reasonably foreseeable misuses.

**584.** Whirlpool knew that the plastic casing to the refrigerator made it unreasonably dangerous and flammable and therefore used metal casing on products sold in the United States.

**585.** By reason of the breach of duties—pursuant to § 402(A) of the Restatement of the Law of Torts (Second)—by Defendant Whirlpool, by and through their agents, servants, workmen, contractors, suppliers, distributors and/or employees as aforesaid, Plaintiffs and their decedents were caused to sustain serious and permanent disabling personal injuries resulting in her tragic death as set forth above.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants Whirlpool, John Does (1-99), ABC Corporations (1-99) and XYZ Corporations (1-99) an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT III – PRODUCTS LIABILITY**

**PLAINTIFF v. SAINT-GOBAIN CORPORATION d/b/a SAINT-GOBAIN NORTH AMERICA and/or d/b/a CELOTEX, JOHN DOES (1-99), ABC CORPORATIONS (1-99) and XYZ CORPORATIONS (1-99)**

**586.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**587.** Defendant Celotex, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, subsidiaries, sister corporations, parent companies, successor corporations, predecessor corporations, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement (Second) of Torts and the Restatement (Third) of Torts: Product Liability because:

- a. Defendant is engaged in the business of designing, manufacturing, assembling, distributing, selling and/or supplying RS5000 Insulation;
- b. The RS5000 Insulation which caused the Grenfell Tower fire Plaintiffs' deaths and injuries was created, designed, marketed and placed in the general stream of commerce by Defendant Celotex;
- c. The RS5000 Insulation was expected to and did reach users without substantial change in the condition in which it was designed, manufactured, assembled, distributed and/or sold;



- d. The RS5000 Insulation was designed, manufactured, assembled, distributed and/or sold in the defective condition for the reasons set forth below.

**588.** Defendant Celotex, by and through their agents, servants, workers, contractors, designers, assemblers, manufacturers, sellers, suppliers and/or distributors, are strictly liable under § 402(A) of the Restatement of the Law of Torts (Second), by:

- a. Designing, assembling, manufacturing, selling, supplying and/or distributing a product in a defective condition;
- b. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was unreasonably dangerous to its intended and foreseeable users;
- c. Designing, assembling, manufacturing, selling, supplying and/or distributing a product that was not safe for all of its intended and represented purposes;
- d. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety features to protect users of the RS5000 PIR Insulation;
- e. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by the highly flammable and combustible nature of the RS5000 PIR Insulation, failing to make all the necessary corrections to eliminate the risk of fire and/or combustion and prevent future fires and injuries;
- f. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by the highly flammable and combustible nature of the RS5000 PIR Insulation, failing to adequately warn users that the RS5000 PIR Insulation was highly flammable and combustible and susceptible to causing, accelerating and/or exacerbating fires;
- g. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by the highly flammable and combustible nature of the RS5000 PIR Insulation, failing to incorporate a flame retardant in the RS5000 PIR Insulation;
- h. Designing, assembling, manufacturing, selling, supplying and/or distributing the RS5000 PIR Insulation with highly flammable and/or combustible components;
- i. Designing, assembling, manufacturing, selling, supplying and/or distributing the RS5000 PIR Insulation under the intentionally false

misrepresentation of the certificate of safety/fire resistance testing that Defendant Celotex purposely falsified;

- j. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by the highly flammable and combustible nature of the RS5000 PIR Insulation, failing to design the subject Insulation to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- k. Despite having actual knowledge of prior fires, property damage and/or serious injuries caused by the highly flammable and combustible nature of the RS5000 PIR Insulation, failing to utilize alternative, feasible designs to avoid any unreasonable risk of harm to anyone who is likely to be exposed to the danger when the product is used in the intended manner or as foreseeably used;
- l. Despite knowing that its RS5000 PIR Insulation was dangerously defective and highly flammable and was therefore not suitable for use on the Grenfell Tower, Celotex knowingly supplied this dangerously defective product;
- m. Designing, assembling, manufacturing, selling, supplying and/or distributing the RS5000 PIR Insulation with absolutely no fire-retardant materials or components, despite knowing that a failure to include fire retardant materials or components rendered the product unreasonably dangerous;
- n. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which lacked all the necessary safety warnings and/or instructions regarding the possible risks of using the product that may be required;
- o. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which did not comply with all applicable NFPA requirements, including but not limited to NFPA 285;
- p. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which did not comply with all applicable IBC requirements and/or codes, including but not limited to IBC 1407 and 1408;
- q. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which did not comply with all applicable ADB 2013 regulations;

- r. Designing, assembling, manufacturing, selling, supplying and/or distributing a product which did not comply with all applicable Section B4(1) functional requirements;
- s. Designing, assembling, manufacturing, selling, supplying and/or distributing a product, the RS5000 PIR Insulation, which was known to release dangerous and toxic cyanide fumes if ignited;
- t. Designing, assembling, manufacturing, selling, supplying and/or distributing a product, the RS5000 PIR Insulation, which was known to release dangerous and toxic fumes if ignited, despite knowing that designing, assembling, manufacturing, selling, supplying and/or distributing such a product posed a significant and substantial risk of harm to the health and safety of the public and the residents of the Grenfell Tower;
- u. Failing to recall the defective and dangerous product after hazards and/or other dangerous incidents were discovered;
- v. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks and hazards of which far outweigh any utility or benefit of the product (i.e. in violation of the risk utility test); and
- w. Designing, assembling, manufacturing, selling, supplying and/or distributing a product the risks or which were unknown or unknowable to the consumer (i.e. in violation of the consumer expectations test).

**589.** By conducting itself as set forth above, Celotex's acts and/or omissions were a substantial factor in, a factual cause of, and/or increased the risk of the fire that caused Plaintiffs' deaths and injuries.

**590.** The RS5000 PIR Insulation was not equipped at the time it left Defendants' possession and control with every element necessary to make it safe for its reasonably foreseeable uses and reasonably foreseeable misuses.

**591.** By reason of the breach of duties—pursuant to § 402(A) of the Restatement of the Law of Torts (Second)—by Defendant Celotex, by and through its agents, servants, workmen, contractors, suppliers, distributors and/or employees as aforesaid, Plaintiffs and their decedents

were caused to sustain serious and permanent disabling personal injuries resulting in her tragic death as set forth above.

**592.** The safety of the public and the residents that would be exposed to the Celotex Defendant's RS5000 PIR Insulation must come first and be the paramount concern and consideration.

**593.** However, the Celotex Defendant knowingly exposed the public and the innocent residents of the Grenfell Tower to the imminent and unreasonable risk of injury and death.

**594.** Defendant Celotex unquestionably knew that its RS5000 PIR Insulation would be utilized on buildings above 40 feet tall and therefore had to include a fire-retardant material or component.

**595.** Failing to utilize a fire-retardant material or component in the RS5000 PIR Insulation presented an unreasonable risk of serious injury and/or death to the public and residents of buildings encased with the RS5000 insulation, including Plaintiff's decedent.

**596.** Defendant Celotex also knew that its RS5000 PIR Insulation would emit dangerous and toxic fumes when ignited.

**597.** Despite this aforementioned knowledge, the Celotex Defendant acted upon its corporate greed and knowingly failed to utilize a flame retardant material or component in its RS5000 PIR Insulation.

**598.** Defendant Celotex's outrageous and reckless decision to supply RS5000 PIR Insulation despite knowing that it was unfit, improper and unreasonably dangerous was orchestrated and controlled from Defendant Celotex's headquarters in Malvern, Pennsylvania, United States.

**599.** Upon information and belief, Celotex knowingly falsified and/or doctored the safety certification and safety testing for the RS5000 Insulation by adding a fire-retardant element and/or component to the RS5000 PIR Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification, while continuing to manufacture and sell the RS5000 PIR Insulation without the fire-retardant element.

**600.** Defendant Celotex unquestionably knew that adding a fire retardant element and/or component to the RS5000 PIR Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification presented an unreasonable and outrageous risk of severe injury and/or death to the public and residents of buildings encased with the RS5000 PIR Insulation, including Plaintiff's decedent.

**601.** Upon information and belief, Defendant Celotex's heinous decision to add a fire-retardant element and/or component to the RS5000 Insulation sample that was used for safety certification, safety testing and/or fire testing solely for the purpose of deceiving and/or falsifying the aforementioned testing and/or certification was orchestrated, controlled, demanded, and/or overseen by Defendant Celotex's headquarters in Malvern, Pennsylvania, United States..

**602.** The decision to add a fire retardant element and/or component to the RS5000 PIR Insulation solely to deceive and/or falsify the safety certification, safety testing and/or fire testing but sell its Insulation without said fire retardant element and/or component is obscenely outrageous, willful and wanton conduct that knowingly placed the health and safety of the members of the public and residents of the Grenfell Tower in jeopardy.

**603.** Defendant Celotex knew that the RS5000 PIR Insulation was unfit for the Tower.

**604.** Defendant Celotex made fraudulent misrepresentations of material fact regarding the safety certification, safety testing and/or fire testing of its RS5000, which Defendant Celotex intended the residents of the Grenfell Tower to rely upon.

**605.** Defendant Celotex made fraudulent misrepresentations of material fact regarding the safety and fitness of its RS5000 for use on the Grenfell Tower, which Defendant Celotex intended the residents of the Grenfell Tower, including Plaintiffs and Plaintiffs' decedents to rely upon.

**606.** The residents of the Grenfell Tower relied upon the aforementioned fraudulent misrepresentations of material fact made by Defendant Celotex.

**607.** The Grenfell Tower residents' reliance on the aforementioned fraudulent misrepresentations made by Defendant Celotex was a factual cause of the harm suffered by Plaintiff's decedent.

**608.** Defendant Celotex exhibited a willful and wanton disregard for the safety and health of the residents of the Grenfell Tower and the public in general.

**609.** By reason of Defendant Celotex's willful and wanton disregard for the safety and health of the residents of Grenfell Tower and the general public, Plaintiffs, and Plaintiffs' decedents, were caused to sustain serious and permanent disabling injuries resulting in their deaths and catastrophic injuries.

WHEREFORE, Plaintiffs demands judgment in their favor and against Defendants Saint-Gobain Corporation d/b/a Saint-Gobain North America and/or d/b/a Celotex, John Does (1-99), ABC Corporations (1-99) and XYZ Corporations (1-99) an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT IV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF GLORIA**  
**TREVISAN v. ALL DEFENDANTS**

610. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

611. Decedent, Gloria Trevisan's known potential wrongful death beneficiaries are: Emanuela Disaro, parent of decedent; Loris Trevisan, parent of decedent; and Giulio Trevisan, sibling of decedent.

612. By reason of the death of Gloria Trevisan, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

613. As a direct and proximate result of the foregoing, decedent, Gloria Trevisan's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

614. Kristen Behrens, Esquire as Administratrix of the Estate of Gloria Trevisan brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT V – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF GLORIA**  
**TREVISAN v. ALL DEFENDANTS**

615. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

616. Plaintiff claims on behalf of the Estate of Gloria Trevisan all damages suffered by the Estate by reason of the death of Gloria Trevisan, including without limiting the generality of the following: the severe injuries to Gloria Trevisan, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Gloria Trevisan suffered prior to her death; the loss of future earning capacity suffered by Gloria Trevisan from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

617. Plaintiff brings this action on behalf of the Estate of Gloria Trevisan, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Gloria Trevisan's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.



**COUNT VI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATEMEH**  
**AFRASEHABI v. ALL DEFENDANTS**

618. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

619. Decedent, Fatemeh Afrasehabi's known potential wrongful death beneficiaries are: Maryam Samimi, child of decedent; Masoumeh Samimi, child of decedent; Raheleh Samimi, child of decedent; Zahra Samimi, child of decedent; and Ghorban Ali Samimi, husband of decedent.

620. By reason of the death of Fatemeh Afrasehabi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

621. As a direct and proximate result of the foregoing, decedent, Fatemeh Afrasehabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

622. Kristen Behrens, Esquire as Administratrix of the Estate of Fatemeh Afrasehabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT VII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATEMEH**  
**AFRASEHABI v. ALL DEFENDANTS**

**623.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**624.** Plaintiff claims on behalf of the Estate of Fatemeh Afrasehabi all damages suffered by the Estate by reason of the death of Fatemeh Afrasehabi, including without limiting the generality of the following: the severe injuries to Fatemeh Afrasehabi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Fatemeh Afrasehabi suffered prior to death; the loss of future earning capacity suffered by Fatemeh Afrasehabi from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**625.** Plaintiff brings this action on behalf of the Estate of Fatemeh Afrasehabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Fatemeh Afrasehabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT VIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SAKINA**  
**AFRASEHABI v. ALL DEFENDANTS**

**626.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**627.** Decedent, Sakina Afrasehabi's known potential wrongful death beneficiaries are: Shiva Aghlani Asl, child of decedent; Mona Aghlani Asl, child of decedent; Nazanin Aghlani Asli, child of decedent; Shahrokh Aglani Asl, child of decedent; and Mohammad Aglani Asl, child of decedent.

**628.** By reason of the death of Sakina Afrasehabi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**629.** As a direct and proximate result of the foregoing, decedent, Sakina Afrasehabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**630.** Kristen Behrens, Esquire as Administratrix of the Estate of Sakina Afrasehabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT IX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SAKINA**  
**AFRASEHABI v. ALL DEFENDANTS**

631. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

632. Plaintiff claims on behalf of the Estate of Sakina Afrasehabi all damages suffered by the Estate by reason of the death of Sakina Afrasehabi, including without limiting the generality of the following: the severe injuries to Sakina Afrasehabi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Sakina Afrasehabi suffered prior to death; the loss of future earning capacity suffered by Sakina Afrasehabi from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

633. Plaintiff brings this action on behalf of the Estate of Sakina Afrasehabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Sakina Afrasehabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT X – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMAL**  
**AHMEDIN v. ALL DEFENDANTS**

634. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

635. Decedent, Amal Ahmedin's known potential wrongful death beneficiaries are: Saidi Osman, parent of decedent; Hawa Ahmedin-Abdelkerim, sibling of decedent; Fatima Ahmedin-Abdelkerim, sibling of decedent; and Mohamed Ahmedin-Abdelkerim, sibling of decedent.

636. By reason of the death of Amal Ahmedin, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

637. As a direct and proximate result of the foregoing, decedent, Amal Ahmedin's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

638. Kristen Behrens, Esquire as Administratrix of the Estate of Amal Ahmedin brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMAL**  
**AHMEDIN v. ALL DEFENDANTS**

639. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

640. Plaintiff claims on behalf of the Estate of Amal Ahmedin all damages suffered by the Estate by reason of the death of Amal Ahmedin, including without limiting the generality of the following: the severe injuries to Amal Ahmedin, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Amal Ahmedin suffered prior to death; the loss of future earning capacity suffered by Amal Ahmedin from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

641. Plaintiff brings this action on behalf of the Estate of Amal Ahmedin, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Amal Ahmedin's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMAYA**  
**AHMEDIN v. ALL DEFENDANTS**

**642.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**643.** Decedent, Amaya Ahmedin's known potential wrongful death beneficiaries are: Saidia Osman, grandparent of decedent; Hawa Ahmedin-Abdelkerim, aunt of decedent; Fatima Ahmedin-Abdelkerim, aunt of decedent; Mohamed Ahmedin-Abdelkerim, uncle of decedent.

**644.** By reason of the death of Amaya Ahmedin, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**645.** As a direct and proximate result of the foregoing, decedent, Amaya Ahmedin's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**646.** Kristen Behrens, Esquire as Administratrix of the Estate of Amaya Ahmedin brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMAYA**  
**AHMEDIN v. ALL DEFENDANTS**

647. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

648. Plaintiff claims on behalf of the Estate of Amaya Ahmedin all damages suffered by the Estate by reason of the death of Amaya Ahmedin, including without limiting the generality of the following: the severe injuries to Amaya Ahmedin, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Amaya Ahmedin suffered prior to death; the loss of future earning capacity suffered by Amaya Ahmedin from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

649. Plaintiff brings this action on behalf of the Estate of Amaya Ahmedin, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Amaya Ahmedin's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMAD**  
**ALHAJALI v. ALL DEFENDANTS**

650. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.



**651.** Decedent, Mohammad Alhajali's known potential wrongful death beneficiaries are: Nedal Alhajali, parent of decedent; Heam Alhajali, parent of decedent; Omar Alhajali, sibling of decedent; Kenda Alhajali, sibling of decedent; Sham Alhajali, sibling of decedent; and Hashem Alhajali, sibling of decedent.

**652.** By reason of the death of Mohammad Alhajali, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**653.** As a direct and proximate result of the foregoing, decedent, Mohammad Alhajali's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**654.** Kristen Behrens, Esquire as Administratrix of the Estate of Mohammad Alhajali brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMAD**  
**ALHAJALI v. ALL DEFENDANTS**

655. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

656. Plaintiff claims on behalf of the Estate of Mohammad Alhajali all damages suffered by the Estate by reason of the death of Mohammad Alhajali, including without limiting the generality of the following: the severe injuries to Mohammad Alhajali, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mohammad Alhajali suffered prior to his death; the loss of future earning capacity suffered by Mohammad Alhajali from the date of his death until the time in the future he would have lived had he not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

657. Plaintiff brings this action on behalf of the Estate of Mohammad Alhajali, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mohammad Alhajali's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ALEXANDRA**  
**ATALA v. ALL DEFENDANTS**

658. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

659. Decedent, Alexandra Atala's known potential wrongful death beneficiaries are: Mark Bennett, uncle of decedent; and Erkan D. Atala, father of decedent.

660. By reason of the death of Alexandra Atala, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

661. As a direct and proximate result of the foregoing, decedent, Alexandra Atala's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

662. Kristen Behrens, Esquire as Administratrix of the Estate of Alexandra Atala brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ALEXANDRA**  
**ATALA v. ALL DEFENDANTS**

663. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

664. Plaintiff claims on behalf of the Estate of Alexandra Atala all damages suffered by the Estate by reason of the death of Alexandra Atala, including without limiting the generality of the following: the severe injuries to Alexandra Atala, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Alexandra Atala suffered prior to her death; the loss of future earning capacity suffered by Alexandra Atala from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

665. Plaintiff brings this action on behalf of the Estate of Alexandra Atala, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Alexandra Atala's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HUSNA BEGUM**  
**v. ALL DEFENDANTS**

666. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

667. Decedent, Husna Begum's known potential wrongful death beneficiaries are: Mohammed Hakim, sibling of decedent; Sujon Miah, sibling of decedent; Mina Begum, sibling of decedent; and Rushna Begum, sibling of decedent.

668. By reason of the death of Husna Begum, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

669. As a direct and proximate result of the foregoing, decedent, Husna Begum's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

670. Kristen Behrens, Esquire as Administratrix of the Estate of Husna Begum brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HUSNA BEGUM**  
**v. ALL DEFENDANTS**

671. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

672. Plaintiff claims on behalf of the Estate of Husna Begum all damages suffered by the Estate by reason of the death of Husna Begum, including without limiting the generality of the following: the severe injuries to Husna Begum, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Husna Begum suffered prior to her death; the loss of future earning

capacity suffered by Husna Begum from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

673. Plaintiff brings this action on behalf of the Estate of Husna Begum, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Husna Begum's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LEENA**  
**BELKADI v. ALL DEFENDANTS**

674. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

675. Decedent, Leena Belkadi's known potential wrongful death beneficiaries are: Tasnim Belkadi, sibling of decedent; El-Alami Hamdan, grandparent of decedent; Rkia Hamdan, aunt of decedent; Safa Hamdan, aunt of decedent; and Samira Hamdan, aunt of decedent.

676. By reason of the death of Leena Belkadi, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

677. As a direct and proximate result of the foregoing, decedent, Leena Belkadi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various

expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

678. Kristen Behrens, Esquire as Administratrix of the Estate of Leena Belkadi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LEENA**  
**BELKADI v. ALL DEFENDANTS**

679. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

680. Plaintiff claims on behalf of the Estate of Leena Belkadi all damages suffered by the Estate by reason of the death of Leena Belkadi, including without limiting the generality of the following: the severe injuries to Leena Belkadi, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Leena Belkadi suffered prior to her death; the loss of future earning capacity suffered by Leena Belkadi from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

681. Plaintiff brings this action on behalf of the Estate of Leena Belkadi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Leena Belkadi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MALAK**  
**BELKADI v. ALL DEFENDANTS**

682. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

683. Decedent, Malak Belkadi's known potential wrongful death beneficiaries are: Tasnim Belkadi, sibling of decedent; El-Alami Hamdan, grandparent of decedent; Rkia Hamdan, aunt of decedent; Safa Hamdan, aunt of decedent; and Samira Hamdan, aunt of decedent.

684. By reason of the death of Malak Belkadi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

685. As a direct and proximate result of the foregoing, decedent, Malak Belkadi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

686. Kristen Behrens, Esquire as Administratrix of the Estate of Malak Belkadi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and



claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MALAK**  
**BELKADI v. ALL DEFENDANTS**

687. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

688. Plaintiff claims on behalf of the Estate of Malak Belkadi all damages suffered by the Estate by reason of the death of Malak Belkadi, including without limiting the generality of the following: the severe injuries to Malak Belkadi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Malak Belkadi suffered prior to death; the loss of future earning capacity suffered by Malak Belkadi from the date of decedent's death until the time in the future decedent would have lived had decedent not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

689. Plaintiff brings this action on behalf of the Estate of Malak Belkadi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Malak Belkadi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF OMAR**  
**BELKADI v. ALL DEFENDANTS**

690. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

691. Decedent, Omar Belkadi's known potential wrongful death beneficiaries are: Rahma Largo, parent of decedent; and Mohamed Belkadi, parent of decedent.

692. By reason of the death of Omar Belkadi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

693. As a direct and proximate result of the foregoing, decedent, Omar Belkadi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

694. Kristen Behrens, Esquire as Administratrix of the Estate of Omar Belkadi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF OMAR**  
**BELKADI v. ALL DEFENDANTS**

695. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

696. Plaintiff claims on behalf of the Estate of Omar Belkadi all damages suffered by the Estate by reason of the death of Omar Belkadi, including without limiting the generality of the following: the severe injuries to Omar Belkadi, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Omar Belkadi suffered prior to his death; the loss of future earning capacity suffered by Omar Belkadi from the date of his death until the time in the future he would have lived had he not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

697. Plaintiff brings this action on behalf of the Estate of Omar Belkadi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Omar Belkadi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF RAYMOND**  
**BERNARD v. ALL DEFENDANTS**

698. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

699. Decedent, Raymond Bernard's known potential wrongful death beneficiaries are: Marlene Anderson, child of decedent; and Julian Bertin, child of decedent.

700. By reason of the death of Raymond Bernard, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

701. As a direct and proximate result of the foregoing, decedent, Raymond Bernard's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

702. Kristen Behrens, Esquire as Administratrix of the Estate of Raymond Bernard brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF RAYMOND**  
**BERNARD v. ALL DEFENDANTS**

703. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

704. Plaintiff claims on behalf of the Estate of Raymond Bernard all damages suffered by the Estate by reason of the death of Raymond Bernard, including without limiting the generality of the following: the severe injuries to Raymond Bernard, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Raymond Bernard suffered prior to his death; the loss of future earning capacity suffered by Raymond Bernard from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

705. Plaintiff brings this action on behalf of the Estate of Raymond Bernard, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Raymond Bernard's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF VINCENT**  
**CHIEJINA v. ALL DEFENDANTS**

706. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

707. Decedent, Vincent Chiejina's known potential wrongful death beneficiaries are: Jindu Maria Chiejina, sibling of decedent; Ngozi Chiejina, sibling of decedent; Obi Chiejina, sibling of decedent; and Magdalene Chiejina, parent of decedent.

708. By reason of the death of Vincent Chiejina, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

709. As a direct and proximate result of the foregoing, decedent, Vincent Chiejina's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

710. Kristen Behrens, Esquire as Administratrix of the Estate of Vincent Chiejina brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF VINCENT**  
**CHIEJINA v. ALL DEFENDANTS**

711. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

712. Plaintiff claims on behalf of the Estate of Vincent Chiejina all damages suffered by the Estate by reason of the death of Vincent Chiejina, including without limiting the generality of the following: the severe injuries to Vincent Chiejina, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Vincent Chiejina suffered prior to his death; the loss of future earning capacity suffered by Vincent Chiejina from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

713. Plaintiff brings this action on behalf of the Estate of Vincent Chiejina, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Vincent Chiejina's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BASSEM**  
**CHOUCAIR v. ALL DEFENDANTS**

714. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

715. Decedent, Bassem Choucair's known potential wrongful death beneficiaries are: Malak Choucair, sibling of decedent; Badar Choucair, parent of decedent; Taan Choucair, parent of decedent; Assad Choucair, sibling of decedent; Wadad Choucair, sibling of decedent; Iman Choucair, sibling of decedent; Sahar Choucair, sibling of decedent; and Tayma Choucair, sibling of decedent.

716. By reason of the death of Bassem Choucair, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

717. As a direct and proximate result of the foregoing, decedent, Bassem Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

718. Kristen Behrens, Esquire as Administratrix of the Estate of Bassem Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BASSEM**  
**CHOUCAIR v. ALL DEFENDANTS**

719. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

720. Plaintiff claims on behalf of the Estate of Bassem Choucair all damages suffered by the Estate by reason of the death of Bassem Choucair, including without limiting the generality of the following: the severe injuries to Bassem Choucair, which resulted in his death;



the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Bassem Choucair suffered prior to his death; the loss of future earning capacity suffered by Bassem Choucair from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

721. Plaintiff brings this action on behalf of the Estate of Bassem Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Bassem Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATIMA**  
**CHOUCAIR v. ALL DEFENDANTS**

722. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

723. Decedent, Fatima Choucair's known potential wrongful death beneficiaries are: Malak Choucair, aunt of decedent; Badar Choucair, grandparent of decedent; Taan Choucair, grandparent of decedent; Assad Choucair, uncle of decedent; Wadad Choucair, uncle of decedent; Iman Choucair, uncle of decedent; Sahar Choucair, uncle of decedent; Tayma Choucair, uncle of decedent; Hisam Choucair, uncle of decedent; Nabil Choucair, uncle of decedent; and Sawsan Choucair, aunt of decedent.

724. By reason of the death of Fatima Choucair, her beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of

companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

725. As a direct and proximate result of the foregoing, decedent, Fatima Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

726. Kristen Behrens, Esquire as Administratrix of the Estate of Fatima Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATIMA**  
**CHOUCAIR v. ALL DEFENDANTS**

727. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

728. Plaintiff claims on behalf of the Estate of Fatima Choucair all damages suffered by the Estate by reason of the death of Fatima Choucair including without limiting the generality of the following: the severe injuries to Fatima Choucair, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Fatima Choucair suffered prior to her death; the loss of future earning

capacity suffered by Fatima Choucair from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

729. Plaintiff brings this action on behalf of the Estate of Fatima Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Fatima Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MIERNA**  
**CHOUCAIR v. ALL DEFENDANTS**

730. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

731. Decedent, Mierna Choucair's known potential wrongful death beneficiaries are: Malak Choucair, aunt of decedent; Badar Choucair, grandparent of decedent; Taan Choucair, grandparent of decedent; Assad Choucair, uncle of decedent; Wadad Choucair, uncle of decedent; Iman Choucair, uncle of decedent; Sahar Choucair, uncle of decedent; Tayma Choucair, uncle of decedent; Hisam Choucair, uncle of decedent; Nabil Choucair, uncle of decedent; Sawan Choucair, aunt of decedent.

732. By reason of the death of Mierna Choucair, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

733. As a direct and proximate result of the foregoing, decedent, Mierna Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

734. Kristen Behrens, Esquire as Administratrix of the Estate of Mierna Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MIERNA**  
**CHOUCAIR v. ALL DEFENDANTS**

735. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

736. Plaintiff claims on behalf of the Estate of Mierna Choucair all damages suffered by the Estate by reason of the death of Mierna Choucair, including without limiting the generality of the following: the severe injuries to Mierna Choucair, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mierna Choucair suffered prior to her death; the loss of future earning capacity suffered by Mierna Choucair from the date of her death until the time in the

future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

737. Plaintiff brings this action on behalf of the Estate of Mierna Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mierna Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NADIA**  
**CHOUCAIR v. ALL DEFENDANTS**

738. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

739. Decedent, Nadia Choucair's known potential wrongful death beneficiaries are: Sawsan Choucair, sibling of decedent; Hisam Choucair, sibling of decedent; and Nabil Choucair, sibling of decedent.

740. By reason of the death of Nadia Choucair, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

741. As a direct and proximate result of the foregoing, decedent, Nadia Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

742. Kristen Behrens, Esquire as Administratrix of the Estate of Nadia Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NADIA**  
**CHOUCAIR v. ALL DEFENDANTS**

743. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

744. Plaintiff claims on behalf of the Estate of Nadia Choucair all damages suffered by the Estate by reason of the death of Nadia Choucair, including without limiting the generality of the following: the severe injuries to Nadia Choucair, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Nadia Choucair suffered prior to her death; the loss of future earning capacity suffered by Nadia Choucair from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

745. Plaintiff brings this action on behalf of the Estate of Nadia Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Nadia Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SIRRIA**  
**CHOUCAIR v. ALL DEFENDANTS**

746. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

747. Decedent, Sirria Choucair's known potential wrongful death beneficiaries are: Sawsan Choucair, child of decedent; Hisam Choucair, child of decedent; and Nabil Choucair, Child of decedent.

748. By reason of the death of Sirria Choucair, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

749. As a direct and proximate result of the foregoing, decedent, Sirria Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

750. Kristen Behrens, Esquire as Administratrix of the Estate of Sirria Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XXXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SIRRIA**  
**CHOUCAIR v. ALL DEFENDANTS**

751. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

752. Plaintiff claims on behalf of the Estate of Sirria Choucair all damages suffered by the Estate by reason of the death of Sirria Choucair, including without limiting the generality of the following: the severe injuries to Sirria Choucair, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Sirria Choucair suffered prior to her death; the loss of future earning capacity suffered by Sirria Choucair from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

753. Plaintiff brings this action on behalf of the Estate of Sirria Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Sirria Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.



**COUNT XL – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ZEINAB**  
**CHOUCAIR v. ALL DEFENDANTS**

754. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

755. Decedent, Zeinab Choucair's known potential wrongful death beneficiaries are: Malak Choucair, aunt of decedent; Badar Choucair, grandparent of decedent; Taan Choucair, grandparent of decedent; Assad Choucair, uncle of decedent; Wadad Choucair, uncle of decedent; Iman Choucair, uncle of decedent; Sahar Choucair, uncle of decedent; Tayma Choucair, uncle of decedent; Hisam Choucair, uncle of decedent; Nabil Choucair, uncle of decedent; and Sawsan Choucair, aunt of decedent.

756. By reason of the death of Zeinab Choucair, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

757. As a direct and proximate result of the foregoing, decedent, Zeinab Choucair's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

758. Kristen Behrens, Esquire as Administratrix of the Estate of Zeinab Choucair brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ZEINAB**  
**CHOUCAIR v. ALL DEFENDANTS**

**759.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**760.** Plaintiff claims on behalf of the Estate of Zeinab Choucair all damages suffered by the Estate by reason of the death of Zeinab Choucair, including without limiting the generality of the following: the severe injuries to Zeinab Choucair, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Zeinab Choucair suffered prior to death; the loss of future earning capacity suffered by Zeinab Choucair from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**761.** Plaintiff brings this action on behalf of the Estate of Zeinab Choucair, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Zeinab Choucair's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JOSEPH**  
**DANIELS v. ALL DEFENDANTS**

762. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

763. Decedent, Joseph Daniels' known potential wrongful death beneficiaries are: Samuel Daniels, child of decedent; and Stephe Hillier, child of decedent.

764. By reason of the death of Joseph Daniels, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

765. As a direct and proximate result of the foregoing, decedent, Joseph Daniels' wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

766. Kristen Behrens, Esquire as Administratrix of the Estate of Joseph Daniels brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JOSEPH**  
**DANIELS v. ALL DEFENDANTS**

767. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

768. Plaintiff claims on behalf of the Estate of Joseph Daniels all damages suffered by the Estate by reason of the death of Joseph Daniels, including without limiting the generality of the following: the severe injuries to Joseph Daniels, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Joseph Daniels suffered prior to his death; the loss of future earning capacity suffered by Joseph Daniels from the date of his death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

769. Plaintiff brings this action on behalf of the Estate of Joseph Daniels, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Joseph Daniels' Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JEREMIAH**  
**DEEN v. ALL DEFENDANTS**

770. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

771. Decedent, Jeremiah Deen's known potential wrongful death beneficiaries are: Zainu Deen, grandfather of decedent.

772. By reason of the death of Jeremiah Deen, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

773. As a direct and proximate result of the foregoing, decedent, Jeremiah Deen's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

774. Kristen Behrens, Esquire as Administratrix of the Estate of Jeremiah Deen brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JEREMIAH**  
**DEEN v. ALL DEFENDANTS**

775. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

776. Plaintiff claims on behalf of the Estate of Jeremiah Deen all damages suffered by the Estate by reason of the death of Jeremiah Deen, including without limiting the generality of the following: the severe injuries to Jeremiah Deen, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Jeremiah Deen suffered prior to his death; the loss of future earning capacity suffered by Jeremiah Deen from the date of his death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

777. Plaintiff brings this action on behalf of the Estate of Jeremiah Deen, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Jeremiah Deen's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ZAINAB DEEN**  
**v. ALL DEFENDANTS**

778. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

779. Decedent, Zainab Deen's known potential wrongful death beneficiaries are: Zainu Deen, parent of decedent; Anna Thomas, parent of decedent; Elizabeth Bangura, child of decedent; and Jemima Hussain, child of decedent.

780. By reason of the death of Zainab Deen, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

781. As a direct and proximate result of the foregoing, decedent, Zainab Deen's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

782. Kristen Behrens, Esquire as Administratrix of the Estate of Zainab Deen brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ZAINAB DEEN**  
**v. ALL DEFENDANTS**

783. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

784. Plaintiff claims on behalf of the Estate of Zainab Deen all damages suffered by the Estate by reason of the death of Zainab Deen, including without limiting the generality of the following: the severe injuries to Zainab Deen, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Zainab Deen suffered prior to death; the loss of future earning capacity suffered by

Zainab Deen from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

785. Plaintiff brings this action on behalf of the Estate of Zainab Deen, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Zainab Deen's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ANTHONY**  
**DISSON v. ALL DEFENDANTS**

786. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

787. Decedent, Anthony Disson's known potential wrongful death beneficiaries are: Cordelia Disson, wife of decedent; Lee Disson, child of decedent; Harriboy Disson, child of decedent; Alfie Disson, child of decedent; and Charlie Disson, child of decedent.

788. By reason of the death of Anthony Disson, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

789. As a direct and proximate result of the foregoing, decedent, Anthony Disson's wrongful death beneficiaries incurred or have been caused to incur and pay large and various



expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

790. Kristen Behrens, Esquire as Administratrix of the Estate of Anthony Disson brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XLIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ANTHONY**  
**DISSON v. ALL DEFENDANTS**

791. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

792. Plaintiff claims on behalf of the Estate of Anthony Disson all damages suffered by the Estate by reason of the death of Anthony Disson, including without limiting the generality of the following: the severe injuries to Anthony Disson, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Anthony Disson suffered prior to his death; the loss of future earning capacity suffered by Anthony Disson from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

793. Plaintiff brings this action on behalf of the Estate of Anthony Disson, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Anthony Disson's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT L – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ESLAH**  
**ELGWAHRY v. ALL DEFENDANTS**

794. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

795. Decedent, Eslah Elgwahry's known potential wrongful death beneficiary is: Ahmed Elgwahry, child of decedent.

796. By reason of the death of Eslah Elgwahry, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

797. As a direct and proximate result of the foregoing, decedent, Eslah Elgwahry's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

798. Kristen Behrens, Esquire as Administratrix of the Estate of Eslah Elgwahry brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and

claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ESLAH**  
**ELGWAHRY v. ALL DEFENDANTS**

799. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

800. Plaintiff claims on behalf of the Estate of Eslah Elgwahry all damages suffered by the Estate by reason of the death of Eslah Elgwahry, including without limiting the generality of the following: the severe injuries to Eslah Elgwahry, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Eslah Elgwahry suffered prior to her death; the loss of future earning capacity suffered by Eslah Elgwahry from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

801. Plaintiff brings this action on behalf of the Estate of Eslah Elgwahry, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Eslah Elgwahry's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARIEM**  
**ELGWAHRY v. ALL DEFENDANTS**

**802.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**803.** Decedent, Mariem Elgwahry's known potential wrongful death beneficiary is: Ahmed Elgwahry, sibling of decedent.

**804.** By reason of the death of Mariem Elgwahry, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**805.** As a direct and proximate result of the foregoing, decedent, Mariem Elgwahry's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**806.** Kristen Behrens, Esquire as Administratrix of the Estate of Mariem Elgwahry brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARIEM**  
**ELGWAHRY v. ALL DEFENDANTS**

**807.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**808.** Plaintiff claims on behalf of the Estate of Mariem Elgwahry all damages suffered by the Estate by reason of the death of Mariem Elgwahry, including without limiting the generality of the following: the severe injuries to Mariem Elgwahry, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mariem Elgwahry suffered prior to her death; the loss of future earning capacity suffered by Mariem Elgwahry from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**809.** Plaintiff brings this action on behalf of the Estate of Mariem Elgwahry, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mariem Elgwahry's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATHIA**  
**AHMED ELSANOUSI v. ALL DEFENDANTS**

**810.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**811.** Decedent, Fathia Ahmed Elsanousi's known potential wrongful death beneficiaries are: Abu Baker Ibrahim, child of decedent; Iman Ibrahim, child of decedent; Gasim Ibrahim, child of decedent; and Hayat Elsanousi, sibling of decedent.

**812.** By reason of the death of Fathia Ahmed Elsanousi, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**813.** As a direct and proximate result of the foregoing, decedent, Fathia Ahmed Elsanousi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**814.** Kristen Behrens, Esquire as Administratrix of the Estate of Fathia Ahmed Elsanousi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FATHIA**  
**AHMED ELSANOUSI v. ALL DEFENDANTS**

**815.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**816.** Plaintiff claims on behalf of the Estate of Fathia Ahmed Elsanousi all damages suffered by the Estate by reason of the death of Fathia Ahmed Elsanousi, including without limiting the generality of the following: the severe injuries to Fathia Ahmed Elsanousi, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Fathia Ahmed Elsanousi suffered prior to her death; the loss of future earning capacity suffered by Fathia Ahmed Elsanousi from the date of her death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**817.** Plaintiff brings this action on behalf of the Estate of Fathia Ahmed Elsanousi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Fathia Ahmed Elsanousi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ABDULAZIZ EL-**  
**WAHABI v. ALL DEFENDANTS**

**818.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**819.** Decedent, Abdulaziz El-Wahabi's known potential wrongful death beneficiaries are: Hanan Wahabi, sibling of decedent; Abdelhamed El-Wahabi, sibling of decedent; Sodiah El-Wahabi, parent of decedent; Amin El-Wahabi, sibling of decedent; Fatima Jones, sibling of decedent; Asia Ghamhi, sibling of decedent; Ghita Chellat, sibling of decedent; Malika El-Gourja, sibling of decedent; and Amina Chaer-Yemlahi, sibling of decedent.

**820.** By reason of the death of Abdulaziz El-Wahabi, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**821.** As a direct and proximate result of the foregoing, decedent, Abdulaziz El-Wahabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**822.** Kristen Behrens, Esquire as Administratrix of the Estate of Abdulaziz El-Wahabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.



WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ABDULAZIZ EL-**  
**WAHABI v. ALL DEFENDANTS**

**823.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**824.** Plaintiff claims on behalf of the Estate of Abdulaziz El-Wahabi all damages suffered by the Estate by reason of the death of Abdulaziz El-Wahabi, including without limiting the generality of the following: the severe injuries to Abdulaziz El-Wahabi, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Abdulaziz El-Wahabi suffered prior to his death; the loss of future earning capacity suffered by Abdulaziz El-Wahabi from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**825.** Plaintiff brings this action on behalf of the Estate of Abdulaziz El-Wahabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Abdulaziz El-Wahabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FAOUZIA EL-**  
**WAHABI v. ALL DEFENDANTS**

**826.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**827.** Decedent, Faouzia El-Wahabi's known potential wrongful death beneficiaries are: Menana Jebari, parent of decedent; Monir Rami, sibling of decedent; Hamida Rami, sibling of decedent; Abdulmoghet Rami, sibling of decedent.

**828.** By reason of the death of Faouzia El-Wahabi, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**829.** As a direct and proximate result of the foregoing, decedent, Faouzia El-Wahabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**830.** Kristen Behrens, Esquire as Administratrix of the Estate of Faouzia El-Wahabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FAOUZIA EL-**  
**WAHABI v. ALL DEFENDANTS**

831. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

832. Plaintiff claims on behalf of the Estate of Faouzia El-Wahabi all damages suffered by the Estate by reason of the death of Faouzia El-Wahabi, including without limiting the generality of the following: the severe injuries to Faouzia El-Wahabi, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Faouzia El-Wahabi suffered prior to her death; the loss of future earning capacity suffered by Faouzia El-Wahabi from the date of death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

833. Plaintiff brings this action on behalf of the Estate of Faouzia El-Wahabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Faouzia El-Wahabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MEHDI EL-**  
**WAHABI v. ALL DEFENDANTS**

834. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**835.** Decedent, Mehdi El-Wahabi's known potential wrongful death beneficiaries are: Menana Jebari, grandmother of decedent; Sodja El-Wahabi, grandmother of decedent; Monir Rami, uncle of decedent; Hamida Rami, aunt of decedent; Abdumoghet Rami, uncle of decedent; Hanan Wahabi, aunt of decedent; Abdelhamed El-Wahabi, uncle of decedent; Amin El-Wahabi, uncle of decedent; Fatima Jones, aunt of decedent; Asia Ghamhi, aunt of decedent; Ghita Chellat, aunt of decedent; Malika El-Gourja, aunt of decedent; Amina Chaer-Yemlahi, aunt of decedent.

**836.** By reason of the death of Mehdi El-Wahabi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**837.** As a direct and proximate result of the foregoing, decedent, Mehdi El-Wahabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**838.** Kristen Behrens, Esquire as Administratrix of the Estate of Mehdi El-Wahabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MEHDI EL-**  
**WAHABI v. ALL DEFENDANTS**

839. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

840. Plaintiff claims on behalf of the Estate of Mehdi El-Wahabi all damages suffered by the Estate by reason of the death of Mehdi El-Wahabi, including without limiting the generality of the following: the severe injuries to Mehdi El-Wahabi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mehdi El-Wahabi suffered prior to death; the loss of future earning capacity suffered by Mehdi El-Wahabi from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

841. Plaintiff brings this action on behalf of the Estate of Mehdi El-Wahabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mehdi El-Wahabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NUR HUDA EL-**  
**WAHABI v. ALL DEFENDANTS**

842. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**843.** Decedent, Nur Huda El-Wahabi's known potential wrongful death beneficiaries are: Menana Jebari, grandmother of decedent; Sodja El-Wahabi, grandmother of decedent; Monir Rami, uncle of decedent; Hamida Rami, aunt of decedent; Abdulmoghet Rami, uncle of decedent; Hanan Wahabi, aunt of decedent; Abdelhamed El-Wahabi, uncle of decedent; Amin El-Wahabi, uncle of decedent; Fatima Jones, aunt of decedent; Asia Ghamhi, aunt of decedent; Ghita Chellat, aunt of decedent; Malika El-Gourja, aunt of decedent; Amina Chaer-Yemlahi, aunt of decedent.

**844.** By reason of the death of Nur Huda El-Wahabi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**845.** As a direct and proximate result of the foregoing, decedent, Nur Huda El-Wahabi wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**846.** Kristen Behrens, Esquire as Administratrix of the Estate of Nur Huda El-Wahabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NUR HUDA EL-**  
**WAHABI v. ALL DEFENDANTS**

847. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

848. Plaintiff claims on behalf of the Estate of Nur Huda El-Wahabi all damages suffered by the Estate by reason of the death of Nur Huda El-Wahabi, including without limiting the generality of the following: the severe injuries to Nur Huda El-Wahabi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Nur Huda El-Wahabi suffered prior to death; the loss of future earning capacity suffered by Nur Huda El-Wahabi from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

849. Plaintiff brings this action on behalf of the Estate of Nur Huda El-Wahabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Nur Huda El-Wahabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YASIN EL-**  
**WAHABI v. ALL DEFENDANTS**

850. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**851.** Decedent, Yasin El-Wahabi's known potential wrongful death beneficiaries are: Menana Jebari, grandmother of decedent; Sodja El-Wahabi, grandmother of decedent; Monir Rami, uncle of decedent; Hamida Rami, aunt of decedent; Abdulmoghet Rami, uncle of decedent; Hanan Wahabi, aunt of decedent; Abdelhamed El-Wahabi, uncle of decedent; Amin El-Wahabi, uncle of decedent; Fatima Jones, aunt of decedent; Asia Ghamhi, aunt of decedent; Ghita Chellat, aunt of decedent; Malika El-Gourja, aunt of decedent; Amina Chaer-Yemlahi, aunt of decedent.

**852.** By reason of the death of Yasin El-Wahabi, the wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**853.** As a direct and proximate result of the foregoing, decedent, Yasin El-Wahabi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**854.** Kristen Behrens, Esquire as Administratrix of the Estate of Yasin El-Wahabi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.



**COUNT LXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YASIN EL-**  
**WAHABI v. ALL DEFENDANTS**

855. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

856. Plaintiff claims on behalf of the Estate of Yasin El-Wahabi all damages suffered by the Estate by reason of the death of Yasin El-Wahabi, including without limiting the generality of the following: the severe injuries to Yasin El-Wahabi, which resulted in death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Yasin El-Wahabi suffered prior to death; the loss of future earning capacity suffered by Yasin El-Wahabi from the date of death until the time in the future decedent would have lived had decedent not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

857. Plaintiff brings this action on behalf of the Estate of Yasin El-Wahabi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Yasin El-Wahabi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LOGAN GOMES**  
**v. ALL DEFENDANTS**

858. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

859. Decedent, Logan Gomes' known potential wrongful death beneficiaries are: Marcio Gomes, parent of decedent; and Andreia Perestrelo, parent of decedent.

860. By reason of the death of Logan Gomes, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

861. As a direct and proximate result of the foregoing, decedent, Logan Gomes' wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

862. Kristen Behrens, Esquire as Administratrix of the Estate of Logan Gomes brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LOGAN GOMES**  
**v. ALL DEFENDANTS**

863. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

864. Plaintiff claims on behalf of the Estate of Logan Gomes all damages suffered by the Estate by reason of the death of Logan Gomes, including without limiting the generality of the following: the severe injuries to Logan Gomes, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Logan Gomes suffered prior to his death; the loss of future earning capacity suffered by Logan Gomes from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

865. Plaintiff brings this action on behalf of the Estate of Logan Gomes, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Logan Gomes' Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARCO**  
**GOTTARDI v. ALL DEFENDANTS**

866. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

867. Decedent, Marco Gottardi's known potential wrongful death beneficiaries are: Giannino Gottardi, parent of decedent; and Daniela Burigotto, parent of decedent.

868. By reason of the death of Marco Gottardi, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited

to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**869.** As a direct and proximate result of the foregoing, decedent, Marco Gottardi's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**870.** Kristen Behrens, Esquire as Administratrix of the Estate of Marco Gottardi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARCO**  
**GOTTARDI v. ALL DEFENDANTS**

**871.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**872.** Plaintiff claims on behalf of the Estate of Marco Gottardi all damages suffered by the Estate by reason of the death of Marco Gottardi, including without limiting the generality of the following: the severe injuries to Marco Gottardi, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Marco Gottardi suffered prior to his death; the loss of future earning

capacity suffered by Marco Gottardi from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

873. Plaintiff brings this action on behalf of the Estate of Marco Gottardi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Marco Gottardi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BERKTI**  
**HAFTOM v. ALL DEFENDANTS**

874. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

875. Decedent, Berkti Haftom's known potential wrongful death beneficiary is: Nahom Tesfay, sibling of decedent.

876. By reason of the death of Berkti Haftom, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

877. As a direct and proximate result of the foregoing, decedent, Berkti Haftom's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

878. Kristen Behrens, Esquire as Administratrix of the Estate of Berkti Haftom brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BERKTI**  
**HAFTOM v. ALL DEFENDANTS**

879. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

880. Plaintiff claims on behalf of the Estate of Berkti Haftom all damages suffered by the Estate by reason of the death of Berkti Haftom, including without limiting the generality of the following: the severe injuries to Berkti Haftom, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Berkti Haftom suffered prior to her death; the loss of future earning capacity suffered by Berkti Haftom from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

881. Plaintiff brings this action on behalf of the Estate of Berkti Haftom, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Berkti Haftom's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BIRUK**  
**HAFTOM v. ALL DEFENDANTS**

**882.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**883.** Decedent, Biruk Haftom's known potential wrongful death beneficiaries are: Hayelom Abriham Woldegabir, parent of decedent; and Nahom Tesfay, sibling of decedent.

**884.** By reason of the death of Biruk Haftom, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**885.** As a direct and proximate result of the foregoing, decedent, Biruk Haftom's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**886.** Kristen Behrens, Esquire as Administratrix of the Estate of Biruk Haftom brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF BIRUK**  
**HAFTOM v. ALL DEFENDANTS**

**887.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**888.** Plaintiff claims on behalf of the Estate of Biruk Haftom all damages suffered by the Estate by reason of the death of Biruk Haftom, including without limiting the generality of the following: the severe injuries to Biruk Haftom, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Biruk Haftom suffered prior to his death; the loss of future earning capacity suffered by Biruk Haftom from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**889.** Plaintiff brings this action on behalf of the Estate of Biruk Haftom, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Biruk Haftom's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.



**COUNT LXXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FARAH**  
**HAMDAN v. ALL DEFENDANTS**

**890.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**891.** Decedent, Farah Hamdan's known potential wrongful death beneficiaries are: Tasnim Belkadi, child of decedent; Rkia Hamdan, sibling of decedent; Safa Hamdan, sibling of decedent; and Samira Hamdan, sibling of decedent.

**892.** By reason of the death of Farah Hamdan, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**893.** As a direct and proximate result of the foregoing, decedent, Farah Hamdan's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**894.** Kristen Behrens, Esquire as Administratrix of the Estate of Farah Hamdan brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FARAH**  
**HAMDAN v. ALL DEFENDANTS**

895. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

896. Plaintiff claims on behalf of the Estate of Farah Hamdan all damages suffered by the Estate by reason of the death of Farah Hamdan, including without limiting the generality of the following: the severe injuries to Farah Hamdan, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Farah Hamdan suffered prior to her death; the loss of future earning capacity suffered by Farah Hamdan from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

897. Plaintiff brings this action on behalf of the Estate of Farah Hamdan, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Farah Hamdan's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMED**  
**HAMID v. ALL DEFENDANTS**

898. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

899. Decedent, Mohammed Hamid's known potential wrongful death beneficiaries are: Mohammed Hakim, sibling of decedent; Sujon Miah, sibling of decedent; Mina Begum, sibling of decedent; Rushna Begum, sibling of decedent.

900. By reason of the death of Mohammed Hamid, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

901. As a direct and proximate result of the foregoing, decedent, Mohammed Hamid's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

902. Kristen Behrens, Esquire as Administratrix of the Estate of Mohammed Hamid brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMED**  
**HAMID v. ALL DEFENDANTS**

903. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

904. Plaintiff claims on behalf of the Estate of Mohammed Hamid all damages suffered by the Estate by reason of the death of Mohammed Hamid, including without limiting the generality of the following: the severe injuries to Mohammed Hamid, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mohammed Hamid suffered prior to his death; the loss of future earning capacity suffered by Mohammed Hamid from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

905. Plaintiff brings this action on behalf of the Estate of Mohammed Hamid, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mohammed Hamid's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMED**  
**HANIF v. ALL DEFENDANTS**

906. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

907. Decedent, Mohammed Hanif's known potential wrongful death beneficiaries are: Mohammed Hakim, sibling of decedent; Sujon Miah, sibling of decedent; Mina Begum, sibling of decedent; and Rushna Begum, sibling of decedent.

908. By reason of the death of Mohammed Hanif, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not

limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

909. As a direct and proximate result of the foregoing, decedent, Mohammed Hanif's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

910. Kristen Behrens, Esquire as Administratrix of the Estate of Mohammed Hanif brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMMED**  
**HANIF v. ALL DEFENDANTS**

911. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

912. Plaintiff claims on behalf of the Estate of Mohammed Hanif all damages suffered by the Estate by reason of the death of Mohammed Hanif, including without limiting the generality of the following: the severe injuries to Mohammed Hanif, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mohammed Hanif suffered prior to his death; the loss of future

earning capacity suffered by Mohammed Hanif from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**913.** Plaintiff brings this action on behalf of the Estate of Mohammed Hanif, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mohammed Hanif's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YAHYA**  
**HASHIM v. ALL DEFENDANTS**

**914.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**915.** Decedent, Yahya Hashim's known potential wrongful death beneficiaries are: Assema Kedir Habib, uncle of decedent; Shemsu Kedir Habib, uncle of decedent; Fatuma Kedir Habib, aunt of decedent; Jemal Kedir Habib, uncle of decedent; Mehammed Kedir Habib, uncle of decedent; Merema Kedir Habib, aunt of decedent; Redwan Kedir, uncle of decedent; Bedriya Hajji Kedir, aunt of decedent; Sadik Jemal Kelbeto, uncle of decedent; Bedriya Jemal Kelbeto, aunt of decedent; Nurya Jemal Kelbeto, aunt of decedent; Jamaledin Nasser, uncle of decedent; Mehamed Nasser, uncle of decedent; Senia Nasser, aunt of decedent; and Fedlu Nasser, aunt of decedent.

**916.** By reason of the death of Yahya Hashim, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

917. As a direct and proximate result of the foregoing, decedent, Yahya Hashim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

918. Kristen Behrens, Esquire as Administratrix of the Estate of Yahya Hashim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YAHYA**  
**HASHIM v. ALL DEFENDANTS**

919. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

920. Plaintiff claims on behalf of the Estate of Yahya Hashim all damages suffered by the Estate by reason of the death of Yahya Hashim, including without limiting the generality of the following: the severe injuries to Yahya Hashim, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Yahya Hashim suffered prior to his death; the loss of future earning

capacity suffered by Yahya Hashim from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

921. Plaintiff brings this action on behalf of the Estate of Yahya Hashim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Yahya Hashim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FIRDAWS**  
**HASHIM v. ALL DEFENDANTS**

922. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

923. Decedent, Firdaws Hashim's known potential wrongful death beneficiaries are: Assema Kedir Habib, uncle of decedent; Shemsu Kedir Habib, uncle of decedent; Fatuma Kedir Habib, aunt of decedent; Jemal Kedir Habib, uncle of decedent; Mehammed Kedir Habib, uncle of decedent; Merema Kedir Habib, aunt of decedent; Redwan Kedir, uncle of decedent; Bedriya Hajji Kedir, aunt of decedent; Sadik Jemal Kelbeto, uncle of decedent; Bedriya Jemal Kelbeto, aunt of decedent; Nurya Jemal Kelbeto, aunt of decedent; Jamaledin Nasser, uncle of decedent; Mehamed Nasser, uncle of decedent; Senia Nasser, aunt of decedent; and Fedlu Nasser, aunt of decedent.

924. By reason of the death of Firdaws Hashim, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited



to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**925.** As a direct and proximate result of the foregoing, decedent, Firdaws Hashim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**926.** Kristen Behrens, Esquire as Administratrix of the Estate of Firdaws Hashim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FIRDAWS**  
**HASHIM v. ALL DEFENDANTS**

**927.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**928.** Plaintiff claims on behalf of the Estate of Firdaws Hashim all damages suffered by the Estate by reason of the death of Firdaws Hashim, including without limiting the generality of the following: the severe injuries to Firdaws Hashim, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Firdaws Hashim suffered prior to her death; the loss of future earning

capacity suffered by Firdaws Hashim from the date of death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

929. Plaintiff brings this action on behalf of the Estate of Firdaws Hashim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Firdaws Hashim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HASHIM KEDIR**  
**v. ALL DEFENDANTS**

930. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

931. Decedent, Hashim Kedir's known potential wrongful death beneficiaries are: Assema Kedir Habib, sibling of decedent; Shemsu Kedir Habib, sibling of decedent; Fatuma Kedir Habib, sibling of decedent; Jemal Kedir Habib, sibling of decedent; Mehammed Kedir Habib, sibling of decedent; Merema Kedir Habib, sibling of decedent; Redwan Kedir, sibling of decedent; and Bedriya Hajji Kedi, sibling of decedent.

932. By reason of the death of Hashim Kedir, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

933. As a direct and proximate result of the foregoing, decedent, Hashim Kedir's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

934. Kristen Behrens, Esquire as Administratrix of the Estate of Hashim Kedir brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HASHIM KEDIR**  
**v. ALL DEFENDANTS**

935. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

936. Plaintiff claims on behalf of the Estate of Hashim Kedir all damages suffered by the Estate by reason of the death of Hashim Kedir, including without limiting the generality of the following: the severe injuries to Hashim Kedir, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Hashim Kedir suffered prior to his death; the loss of future earning capacity suffered by Hashim Kedir from the date of death until the time in the future he would

have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

937. Plaintiff brings this action on behalf of the Estate of Hashim Kedir, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Hashim Kedir's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YAQUB**  
**HASHIM v. ALL DEFENDANTS**

938. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

939. Decedent, Yaqub Hashim's known potential wrongful death beneficiaries are: Assema Kedir Habib, uncle of decedent; Shemsu Kedir Habib, uncle of decedent; Fatuma Kedir Habib, aunt of decedent; Jemal Kedir Habib, uncle of decedent; Mehammed Kedir Habib, uncle of decedent; Merema Kedir Habib, aunt of decedent; Redwan Kedir, uncle of decedent; Bedriya Hajji Kedir, aunt of decedent; Sadik Jemal Kelbeto, uncle of decedent; Bedriya Jemal Kelbeto, aunt of decedent; Nurya Jemal Kelbeto, aunt of decedent; Jamaledin Nasser, uncle of decedent; Mehamed Nasser, uncle of decedent; Senia Nasser, aunt of decedent; and Fedlu Nasser, aunt of decedent.

940. By reason of the death of Yaqub Hashim, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

941. As a direct and proximate result of the foregoing, decedent, Yaqub Hashim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

942. Kristen Behrens, Esquire as Administratrix of the Estate of Yaqub Hashim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF YAQUB**  
**HASHIM v. ALL DEFENDANTS**

943. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

944. Plaintiff claims on behalf of the Estate of Yaqub Hashim all damages suffered by the Estate by reason of the death of Yaqub Hashim, including without limiting the generality of the following: the severe injuries to Yaqub Hashim, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Yaqub Hashim suffered prior to his death; the loss of future earning

capacity suffered by Yaqub Hashim from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

945. Plaintiff brings this action on behalf of the Estate of Yaqub Hashim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Yaqub Hashim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FETHIA**  
**HASSAN v. ALL DEFENDANTS**

946. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

947. Decedent, Fethia Hassan's known potential wrongful death beneficiaries are: Awadh Hassan Hassan, parent of decedent; and Sayeda Ibrahim, aunt of decedent.

948. By reason of the death of Fethia Hassan, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

949. As a direct and proximate result of the foregoing, decedent, Fethia Hassan's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**950.** Kristen Behrens, Esquire as Administratrix of the Estate of Fethia Hassan brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT LXXXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF FETHIA**  
**HASSAN v. ALL DEFENDANTS**

**951.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**952.** Plaintiff claims on behalf of the Estate of Fethia Hassan all damages suffered by the Estate by reason of the death of Fethia Hassan, including without limiting the generality of the following: the severe injuries to Fethia Hassan, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Fethia Hassan suffered prior to her death; the loss of future earning capacity suffered by Fethia Hassan from the date of death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**953.** Plaintiff brings this action on behalf of the Estate of Fethia Hassan, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Fethia Hassan's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XC – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HANIA HASSAN**  
**v. ALL DEFENDANTS**

954. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

955. Decedent, Hania Hassan's known potential wrongful death beneficiaries are: Awadh Hassan Hassan, parent of decedent; and Sayeda Ibrahim, aunt of decedent.

956. By reason of the death of Hania Hassan, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

957. As a direct and proximate result of the foregoing, decedent, Hania Hassan's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

958. Kristen Behrens, Esquire as Administratrix of the Estate of Hania Hassan brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold



in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HANIA HASSAN**  
**v. ALL DEFENDANTS**

959. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

960. Plaintiff claims on behalf of the Estate of Hania Hassan all damages suffered by the Estate by reason of the death of Hania Hassan, including without limiting the generality of the following: the severe injuries to Hania Hassan, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Hania Hassan suffered prior to her death; the loss of future earning capacity suffered by Hania Hassan from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

961. Plaintiff brings this action on behalf of the Estate of Hania Hassan, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Hania Hassan's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ABUFARS**  
**IBRAHIM v. ALL DEFENDANTS**

962. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

963. Decedent, Abufars Ibrahim's known potential wrongful death beneficiaries are: Abu Baker Ibrahim, sibling of decedent; Iman Ibrahim, sibling of decedent; and Gasim Ibrahim, sibling of decedent.

964. By reason of the death of Abufars Ibrahim, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

965. As a direct and proximate result of the foregoing, decedent, Abufars Ibrahim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

966. Kristen Behrens, Esquire as Administratrix of the Estate of Abufars Ibrahim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ABUFARS**  
**IBRAHIM v. ALL DEFENDANTS**

967. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

968. Plaintiff claims on behalf of the Estate of Abufars Ibrahim all damages suffered by the Estate by reason of the death of Abufars Ibrahim, including without limiting the generality of the following: the severe injuries to Abufars Ibrahim, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Abufars Ibrahim suffered prior to his death; the loss of future earning capacity suffered by Abufars Ibrahim from the date of death until the time in the future he would have lived had he not died as a result of the injuries he sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

969. Plaintiff brings this action on behalf of the Estate of Abufars Ibrahim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Abufars Ibrahim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ISRA IBRAHIM**  
**v. ALL DEFENDANTS**

970. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

971. Decedent, Isra Ibrahim's known potential wrongful death beneficiaries are: Said Essaouini, spouse of decedent; Abu Baker Ibrahim, sibling of decedent; Iman Ibrahim, sibling of decedent; and Gasim Ibrahim, sibling of decedent.

972. By reason of the death of Isra Ibrahim, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

973. As a direct and proximate result of the foregoing, decedent, Isra Ibrahim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

974. Kristen Behrens, Esquire as Administratrix of the Estate of Isra Ibrahim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ISRA IBRAHIM**  
**v. ALL DEFENDANTS**

975. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

976. Plaintiff claims on behalf of the Estate of Isra Ibrahim all damages suffered by the Estate by reason of the death of Isra Ibrahim, including without limiting the generality of the following: the severe injuries to Isra Ibrahim, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Isra Ibrahim suffered prior to her death; the loss of future earning capacity suffered by Isra Ibrahim from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

977. Plaintiff brings this action on behalf of the Estate of Isra Ibrahim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Isra Ibrahim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF RANIA**  
**IBRAHIM v. ALL DEFENDANTS**

978. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

979. Decedent, Rania Ibrahim's known potential wrongful death beneficiaries are: Awadh Hassan Hassan, spouse of decedent; and Sayeda Ibrahim, sibling of decedent.

980. By reason of the death of Rania Ibrahim, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

981. As a direct and proximate result of the foregoing, decedent, Rania Ibrahim's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

982. Kristen Behrens, Esquire as Administratrix of the Estate of Rania Ibrahim brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF RANIA**  
**IBRAHIM v. ALL DEFENDANTS**

983. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

984. Plaintiff claims on behalf of the Estate of Rania Ibrahim all damages suffered by the Estate by reason of the death of Rania Ibrahim, including without limiting the generality of the following: the severe injuries to Rania Ibrahim, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Rania Ibrahim suffered prior to her death; the loss of future earning

capacity suffered by Rania Ibrahim from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

985. Plaintiff brings this action on behalf of the Estate of Rania Ibrahim, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Rania Ibrahim's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMNA**  
**MAHMUD IDRIS v. ALL DEFENDANTS**

986. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

987. Decedent, Amna Mahmud Idris' known potential wrongful death beneficiaries are: Ibrahim Abubaker Abdalkarim, spouse of decedent.

988. By reason of the death of Amna Mahmud Idris, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

989. As a direct and proximate result of the foregoing, decedent, Amna Mahmud Idris' wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

990. Kristen Behrens, Esquire as Administratrix of the Estate of Amna Mahmud Idris brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT XCIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF AMNA**  
**MAHMUD IDRIS v. ALL DEFENDANTS**

991. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

992. Plaintiff claims on behalf of the Estate of Amna Mahmud Idris all damages suffered by the Estate by reason of the death of Amna Mahmud Idris, including without limiting the generality of the following: the severe injuries to Amna Mahmud Idris, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Amna Mahmud Idris suffered prior to her death; the loss of future earning capacity suffered by Amna Mahmud Idris from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

993. Plaintiff brings this action on behalf of the Estate of Amna Mahmud Idris, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Amna Mahmud Idris' Estate, and other persons entitled to recover under law.



WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT C – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ALI YAWAR**  
**JAFARI v. ALL DEFENDANTS**

994. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

995. Decedent, Ali Yawar Jafari's known potential wrongful death beneficiaries are: Fatima Jafari, spouse of decedent; Nadia Jafari, child of decedent; Maria Jafari, child of decedent; Bashir Jafari, child of decedent; Hamid Jafari, child of decedent; Farid Jafari, child of decedent.

996. By reason of the death of Ali Yawar Jafari, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

997. As a direct and proximate result of the foregoing, decedent, Ali Yawar Jafari's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

998. Kristen Behrens, Esquire as Administratrix of the Estate of Ali Yawar Jafari brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ALI YAWAR**  
**JAFARI v. ALL DEFENDANTS**

999. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1000. Plaintiff claims on behalf of the Estate of Ali Yawar Jafari all damages suffered by the Estate by reason of the death of Ali Yawar Jafari, including without limiting the generality of the following: the severe injuries to Ali Yawar Jafari, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Ali Yawar Jafari suffered prior to his death; the loss of future earning capacity suffered by Ali Yawar Jafari from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1001. Plaintiff brings this action on behalf of the Estate of Ali Yawar Jafari, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Ali Yawar Jafari's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NURA JEMAL v.**  
**ALL DEFENDANTS**

**1002.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1003.** Decedent, Nura Jemal's known potential wrongful death beneficiaries are: Sadik Jemal Kelbeto, sibling of decedent; Bedriya Jemal Kelbeto, sibling of decedent; Nurya Jemal Kelbeto, sibling of decedent; Jamaledin Nasser, sibling of decedent; Mehamed Nasser, sibling of decedent; Senia Nasser, sibling of decedent; Fedlu Nasser, sibling of decedent.

**1004.** By reason of the death of Nura Jemal, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1005.** As a direct and proximate result of the foregoing, decedent, Nura Jemal's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1006.** Kristen Behrens, Esquire as Administratrix of the Estate of Nura Jemal brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF NURA JEMAL v.**  
**ALL DEFENDANTS**

**1007.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1008.** Plaintiff claims on behalf of the Estate of Nura Jemal all damages suffered by the Estate by reason of the death of Nura Jemal, including without limiting the generality of the following: the severe injuries to Nura Jemal, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Nura Jemal suffered prior to her death; the loss of future earning capacity suffered by Nura Jemal from the date of death until the time in the future she would have lived had she not died as a result of the injuries she sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1009.** Plaintiff brings this action on behalf of the Estate of Nura Jemal, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Nura Jemal's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HAMID KANI v.**  
**ALL DEFENDANTS**

1010. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1011. Decedent, Hamid Kani's known potential wrongful death beneficiaries are: Masoud Shahabeddin, cousin of decedent; Fatemeh Kani, sibling of decedent; Hussain Kani, sibling of decedent; Zoreh Banoo Kani, sibling of decedent.

1012. By reason of the death of Hamid Kani, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1013. As a direct and proximate result of the foregoing, decedent, Hamid Kani's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1014. Kristen Behrens, Esquire as Administratrix of the Estate of Hamid Kani brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF HAMID KANI v.**  
**ALL DEFENDANTS**

1015. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1016. Plaintiff claims on behalf of the Estate of Hamid Kani all damages suffered by the Estate by reason of the death of Hamid Kani, including without limiting the generality of the following: the severe injuries to Hamid Kani, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Hamid Kani suffered prior to his death; the loss of future earning capacity suffered by Hamid Kani from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1017. Plaintiff brings this action on behalf of the Estate of Hamid Kani, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Hamid Kani's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KHADIJA**  
**KHALLOUFI v. ALL DEFENDANTS**

1018. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1019. Decedent, Khadija Khalloufi's known potential wrongful death beneficiaries are: Sabah Abdullah, spouse of decedent; and Alex Abdullah, child of decedent.

1020. By reason of the death of Khadija Khalloufi, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1021. As a direct and proximate result of the foregoing, decedent, Khadija Khalloufi wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1022. Kristen Behrens, Esquire as Administratrix of the Estate of Khadija Khalloufi brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KHADIJA**  
**KHALLOUFI v. ALL DEFENDANTS**

1023. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1024.** Plaintiff claims on behalf of the Estate of Khadija Khalloufi all damages suffered by the Estate by reason of the death of Khadija Khalloufi, including without limiting the generality of the following: the severe injuries to Khadija Khalloufi, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Khadija Khalloufi suffered prior to her death; the loss of future earning capacity suffered by Khadija Khalloufi from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1025.** Plaintiff brings this action on behalf of the Estate of Khadija Khalloufi, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Khadija Khalloufi's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF VICTORIA**  
**KING v. ALL DEFENDANTS**

**1026.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1027.** Decedent, Victoria King's known potential wrongful death beneficiaries are: Mark Bennett, sibling of decedent.

**1028.** By reason of the death of Victoria King, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,



loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1029.** As a direct and proximate result of the foregoing, decedent, Victoria King wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1030.** Kristen Behrens, Esquire as Administratrix of the Estate of Victoria King brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF VICTORIA**  
**KING v. ALL DEFENDANTS**

**1031.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1032.** Plaintiff claims on behalf of the Estate of Victoria King all damages suffered by the Estate by reason of the death of Victoria King, including without limiting the generality of the following: the severe injuries to Victoria King, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Victoria King suffered prior to her death; the loss of future earning

capacity suffered by Victoria King from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1033.** Plaintiff brings this action on behalf of the Estate of Victoria King, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Victoria King's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF DEBORAH**  
**LAMPRELL v. ALL DEFENDANTS**

**1034.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1035.** Decedent, Deborah Lamprell's known potential wrongful death beneficiaries are: Miriam Lamprell, parent of decedent.

**1036.** By reason of the death of Deborah Lamprell, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1037.** As a direct and proximate result of the foregoing, decedent, Deborah Lamprell's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1038. Kristen Behrens, Esquire as Administratrix of the Estate of Deborah Lamprell brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF DEBORAH**  
**LAMPRELL v. ALL DEFENDANTS**

1039. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1040. Plaintiff claims on behalf of the Estate of Deborah Lamprell all damages suffered by the Estate by reason of the death of Deborah Lamprell, including without limiting the generality of the following: the severe injuries to Deborah Lamprell, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Deborah Lamprell suffered prior to her death; the loss of future earning capacity suffered by Deborah Lamprell from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1041. Plaintiff brings this action on behalf of the Estate of Deborah Lamprell, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Deborah Lamprell's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF GARY**  
**MAUNDERS v. ALL DEFENDANTS**

**1042.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1043.** Decedent, Gary Maunders' known potential wrongful death beneficiaries are: Ann Pumar, partner of decedent; Aaron Maunders, child of decedent; and Saskia Maunders, child of decedent.

**1044.** By reason of the death of Gary Maunders, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1045.** As a direct and proximate result of the foregoing, decedent, Gary Maunders' wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1046.** Kristen Behrens, Esquire as Administratrix of the Estate of Gary Maunders brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF GARY**  
**MAUNDERS v. ALL DEFENDANTS**

**1047.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1048.** Plaintiff claims on behalf of the Estate of Gary Maunders all damages suffered by the Estate by reason of the death of Gary Maunders, including without limiting the generality of the following: the severe injuries to Gary Maunders, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Gary Maunders suffered prior to his death; the loss of future earning capacity suffered by Gary Maunders from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1049.** Plaintiff brings this action on behalf of the Estate of Gary Maunders, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Gary Maunders' Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARY MENDY**  
**v. ALL DEFENDANTS**

**1050.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1051.** Decedent, Mary Mendy's known potential wrongful death beneficiaries are: David Johnson, sibling of decedent; Caroline Johnson, sibling of decedent; Nathaniel Johnson, sibling of decedent; and Pa Sa, sibling of decedent.

**1052.** By reason of the death of Mary Mendy, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1053.** As a direct and proximate result of the foregoing, decedent, Mary Mendy's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1054.** Kristen Behrens, Esquire as Administratrix of the Estate of Mary Mendy brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARY MENDY**  
**v. ALL DEFENDANTS**

**1055.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1056.** Plaintiff claims on behalf of the Estate of Mary Mendy all damages suffered by the Estate by reason of the death of Mary Mendy, including without limiting the generality of the following: the severe injuries to Mary Mendy, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mary Mendy suffered prior to her death; the loss of future earning capacity suffered by Mary Mendy from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1057.** Plaintiff brings this action on behalf of the Estate of Mary Mendy, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mary Mendy's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KAMRU MIAH**  
**v. ALL DEFENDANTS**

**1058.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1059. Decedent, Kamru Miah's known potential wrongful death beneficiaries are: Joleka Khatun, spouse of decedent; Sujon Miah, child of decedent; Mina Begum, child of decedent; Rushna Begum, child of decedent; and Mohammed Hakim, child of decedent.

1060. By reason of the death of Kamru Miah, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1061. As a direct and proximate result of the foregoing, decedent, Kamru Miah's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1062. Kristen Behrens, Esquire as Administratrix of the Estate of Kamru Miah brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KAMRU MIAH**  
**v. ALL DEFENDANTS**

1063. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.



1064. Plaintiff claims on behalf of the Estate of Kamru Miah all damages suffered by the Estate by reason of the death of Kamru Miah, including without limiting the generality of the following: the severe injuries to Kamru Miah, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Kamru Miah suffered prior to his death; the loss of future earning capacity suffered by Kamru Miah from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1065. Plaintiff brings this action on behalf of the Estate of Kamru Miah, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Kamru Miah's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LIGAYA**  
**MOORE v. ALL DEFENDANTS**

1066. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1067. Decedent, Ligaya Moore's known potential wrongful death beneficiaries are: Estelita Reyes Griego, sibling of decedent; Zenaida Reyes Purification, sibling of decedent; Mary Ann Purification, niece of decedent; Rodolpho Purification, nephew of decedent; and Caroline Custodio, niece of decedent.

1068. By reason of the death of Ligaya Moore, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1069. As a direct and proximate result of the foregoing, decedent, Ligaya Moore's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1070. Kristen Behrens, Esquire as Administratrix of the Estate of Ligaya Moore brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF LIGAYA**  
**MOORE v. ALL DEFENDANTS**

1071. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1072. Plaintiff claims on behalf of the Estate of Ligaya Moore all damages suffered by the Estate by reason of the death of Ligaya Moore, including without limiting the generality of the following: the severe injuries to Ligaya Moore, which resulted in her death; the anxiety,

horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Ligaya Moore suffered prior to her death; the loss of future earning capacity suffered by Ligaya Moore from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1073. Plaintiff brings this action on behalf of the Estate of Ligaya Moore, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Ligaya Moore's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF DENIS MURPHY**  
**v. ALL DEFENDANTS**

1074. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1075. Decedent, Denis Murphy's known potential wrongful death beneficiaries are: Peter Murphy, child of decedent; Anne Murphy, parent of decedent; Mick Galligan, sibling of decedent; Tim Murphy, sibling of decedent; and Anne-Marie Murphy, sibling of decedent.

1076. By reason of the death of Denis Murphy, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1077. As a direct and proximate result of the foregoing, decedent, Denis Murphy's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1078. Kristen Behrens, Esquire as Administratrix of the Estate of Denis Murphy brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF DENIS MURPHY**  
**v. ALL DEFENDANTS**

1079. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1080. Plaintiff claims on behalf of the Estate of Denis Murphy all damages suffered by the Estate by reason of the death of Denis Murphy, including without limiting the generality of the following: the severe injuries to Denis Murphy, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Denis Murphy suffered prior to his death; the loss of future earning capacity suffered by Denis Murphy from the date of death until the time in the future he would

have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1081. Plaintiff brings this action on behalf of the Estate of Denis Murphy, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Denis Murphy's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMED**  
**AMIED NEDA v. ALL DEFENDANTS**

1082. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1083. Decedent, Mohamed Amied Neda's known potential wrongful death beneficiaries are: Shakila Flora Neda, spouse of decedent; and Farhad Shekeb Neda, child of decedent.

1084. By reason of the death of Mohamed Amied Neda, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1085. As a direct and proximate result of the foregoing, decedent, Mohamed Amied Neda's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and

estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1086.** Kristen Behrens, Esquire as Administratrix of the Estate of Mohamed Amied Neda brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMED**  
**AMIED NEDA v. ALL DEFENDANTS**

**1087.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1088.** Plaintiff claims on behalf of the Estate of Mohamed Amied Neda all damages suffered by the Estate by reason of the death of Mohamed Amied Neda, including without limiting the generality of the following: the severe injuries to Mohamed Amied Neda, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mohamed Amied Neda suffered prior to his death; the loss of future earning capacity suffered by Mohamed Amied Neda from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1089.** Plaintiff brings this action on behalf of the Estate of Mohamed Amied Neda, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mohamed Amied Neda's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ISAAC PAULOS**  
**v. ALL DEFENDANTS**

**1090.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1091.** Decedent, Isaac Paulos' known potential wrongful death beneficiaries are: Paulos Woldesilassie Tekle, parent of decedent; Genet Shawo, parent of decedent; and Lukas Paulos, sibling of decedent.

**1092.** By reason of the death of Isaac Paulos, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1093.** As a direct and proximate result of the foregoing, decedent, Isaac Paulos' wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1094.** Kristen Behrens, Esquire as Administratrix of the Estate of Isaac Paulos brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and

claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ISAAC PAULOS**  
**v. ALL DEFENDANTS**

**1095.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1096.** Plaintiff claims on behalf of the Estate of Isaac Paulos all damages suffered by the Estate by reason of the death of Isaac Paulos, including without limiting the generality of the following: the severe injuries to Isaac Paulos, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Isaac Paulos suffered prior to his death; the loss of future earning capacity suffered by Isaac Paulos from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1097.** Plaintiff brings this action on behalf of the Estate of Isaac Paulos, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Isaac Paulos' Estate, and other persons entitled to recover under law.



WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARIA DEL**  
**PILAR BURTON v. ALL DEFENDANTS**

**1098.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1099.** Decedent, Maria Del Pilar Burton's known potential wrongful death beneficiaries are: Nicholas Burton, spouse of decedent; Victor Anyos, child of decedent; and Angeles Santiago, sibling of decedent.

**1100.** By reason of the death of Maria Del Pilar Burton, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1101.** As a direct and proximate result of the foregoing, decedent, Maria Del Pilar Burton's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1102.** Kristen Behrens, Esquire as Administratrix of the Estate of Maria Del Pilar Burton brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and

Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARIA DEL**  
**PILAR BURTON v. ALL DEFENDANTS**

**1103.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1104.** Plaintiff claims on behalf of the Estate of Maria Del Pilar Burton all damages suffered by the Estate by reason of the death of Maria Del Pilar Burton, including without limiting the generality of the following: the severe injuries to Maria Del Pilar Burton, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Maria Del Pilar Burton suffered prior to her death; the loss of future earning capacity suffered by Maria Del Pilar Burton from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1105.** Plaintiff brings this action on behalf of the Estate of Maria Del Pilar Burton, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Maria Del Pilar Burton's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF STEVEN**  
**POWER v. ALL DEFENDANTS**

1106. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1107. Decedent, Steven Power's known potential wrongful death beneficiaries are: Rebecca Ross, child of decedent; Bobby Ross, child of decedent; Wayne Power-Davis, child of decedent; Craig Power, child of decedent; and Sherrie Power, child of decedent.

1108. By reason of the death of Steven Power, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort; loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1109. As a direct and proximate result of the foregoing, decedent, Steven Power's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1110. Kristen Behrens, Esquire as Administratrix of the Estate of Steven Power brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF STEVEN**  
**POWER v. ALL DEFENDANTS**

1111. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1112. Plaintiff claims on behalf of the Estate of Steven Power all damages suffered by the Estate by reason of the death of Steven Power, including without limiting the generality of the following: the severe injuries to Steven Power, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Steven Power suffered prior to his death; the loss of future earning capacity suffered by Steven Power from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1113. Plaintiff brings this action on behalf of the Estate of Steven Power, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Steven Power's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXX – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JESSICA**  
**URBANO RAMIREZ v. ALL DEFENDANTS**

1114. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1115. Decedent, Jessica Urbano Ramirez's known potential wrongful death beneficiaries are: Adriana Ramirez, parent of decedent; Ramiro Urbano Ramirez, parent of decedent; and Melanie Urbano Ramirez, sibling of decedent.

1116. By reason of the death of Jessica Urbano Ramirez, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1117. As a direct and proximate result of the foregoing, decedent, Jessica Urbano Ramirez's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1118. Kristen Behrens, Esquire as Administratrix of the Estate of Jessica Urbano Ramirez brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold

in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF JESSICA**  
**URBANO RAMIREZ v. ALL DEFENDANTS**

1119. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1120. Plaintiff claims on behalf of the Estate of Jessica Urbano Ramirez all damages suffered by the Estate by reason of the death of Jessica Urbano Ramirez, including without limiting the generality of the following: the severe injuries to Jessica Urbano Ramirez, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Jessica Urbano Ramirez suffered prior to her death; the loss of future earning capacity suffered by Jessica Urbano Ramirez from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1121. Plaintiff brings this action on behalf of the Estate of Jessica Urbano Ramirez, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Jessica Urbano Ramirez's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KHADIJA SAYE**  
**v. ALL DEFENDANTS**

**1122.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1123.** Decedent, Khadija Saye's known potential wrongful death beneficiaries are: Caroline Johnson, aunt of decedent; Nathaniel Johnson, uncle of decedent; David Johnson, uncle of decedent; and Pa Sarr, uncle of decedent.

**1124.** By reason of the death of Khadija Saye, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1125.** As a direct and proximate result of the foregoing, decedent, Khadija Saye's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1126.** Kristen Behrens, Esquire as Administratrix of the Estate of Khadija Saye brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXIII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF KHADIJA SAYE**  
**v. ALL DEFENDANTS**

1127. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1128. Plaintiff claims on behalf of the Estate of Khadija Saye all damages suffered by the Estate by reason of the death of Khadija Saye, including without limiting the generality of the following: the severe injuries to Khadija Saye, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Khadija Saye suffered prior to her death; the loss of future earning capacity suffered by Khadija Saye from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1129. Plaintiff brings this action on behalf of the Estate of Khadija Saye, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Khadija Saye's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXIV – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SHEILA SMITH**  
**v. ALL DEFENDANTS**

1130. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.



**1131.** Decedent, Sheila Smith's known potential wrongful death beneficiaries are: Martyn Smith, child of decedent; Adam Smith, child of decedent; Rachel Tassell, grandchild of decedent; Harriet Smith, grandchild of decedent; David Smith, grandchild of decedent; Francesca Smith, grandchild of decedent; Clara Smith, grandchild of decedent; Cameron Smith, grandchild of decedent; Isabella Sheila Smith, grandchild of decedent.

**1132.** By reason of the death of Sheila Smith, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1133.** As a direct and proximate result of the foregoing, decedent, Sheila Smith's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1134.** Kristen Behrens, Esquire as Administratrix of the Estate of Sheila Smith brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXV – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF SHEILA SMITH**  
**v. ALL DEFENDANTS**

1135. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1136. Plaintiff claims on behalf of the Estate of Sheila Smith all damages suffered by the Estate by reason of the death of Sheila Smith, including without limiting the generality of the following: the severe injuries to Sheila Smith, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Sheila Smith suffered prior to her death; the loss of future earning capacity suffered by Sheila Smith from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1137. Plaintiff brings this action on behalf of the Estate of Sheila Smith, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Sheila Smith's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXVI – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMEDNUR**  
**TUCCU v. ALL DEFENDANTS**

1138. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1139. Decedent, Mohamednur Tuccu's known potential wrongful death beneficiaries are: Ibrahim Toukou, sibling of decedent.

1140. By reason of the death of Mohamednur Tuccu, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

1141. As a direct and proximate result of the foregoing, decedent, Mohamednur Tuccu wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

1142. Kristen Behrens, Esquire as Administratrix of the Estate of Mohamednur Tuccu brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXVII – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MOHAMEDNUR**  
**TUCCU v. ALL DEFENDANTS**

1143. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1144. Plaintiff claims on behalf of the Estate of Mohamednur Tuccu all damages suffered by the Estate by reason of the death of Mohamednur Tuccu, including without limiting the generality of the following: the severe injuries to Mohamednur Tuccu, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Mohamednur Tuccu suffered prior to his death; the loss of future earning capacity suffered by Mohamednur Tuccu from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

1145. Plaintiff brings this action on behalf of the Estate of Mohamednur Tuccu, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Mohamednur Tuccu's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXVIII – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ERNIE VITAL v.**  
**ALL DEFENDANTS**

1146. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1147. Decedent, Ernie Vital's known potential wrongful death beneficiaries are: Celestine Germain, parent of decedent; and Keiron Anthony Vital, sibling of decedent.

1148. By reason of the death of Ernie Vital, his wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to,

loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1149.** As a direct and proximate result of the foregoing, decedent, Ernie Vital's wrongful death beneficiaries incurred or have been caused to incur and pay large and various expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1150.** Kristen Behrens, Esquire as Administratrix of the Estate of Ernie Vital brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXXXIX – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF ERNIE VITAL v.**  
**ALL DEFENDANTS**

**1151.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1152.** Plaintiff claims on behalf of the Estate of Ernie Vital all damages suffered by the Estate by reason of the death of Ernie Vital, including without limiting the generality of the following: the severe injuries to Ernie Vital, which resulted in his death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Ernie Vital suffered prior to his death; the loss of future earning capacity suffered

by Ernie Vital from the date of death until the time in the future he would have lived had he not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1153.** Plaintiff brings this action on behalf of the Estate of Ernie Vital, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Ernie Vital's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXL – WRONGFUL DEATH**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARJORIE**  
**VITAL v. ALL DEFENDANTS**

**1154.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1155.** Decedent, Marjorie Vital's known potential wrongful death beneficiaries are: Keiron Anthony Vital, child of decedent; Paula Bellot, sibling of decedent; Mac Vital, sibling of decedent; and Griffith Vital, sibling of decedent.

**1156.** By reason of the death of Marjorie Vital, her wrongful death beneficiaries have in the past and will in the future continue to suffer great pecuniary loss, including but not limited to, loss of companionship, loss of comfort, loss of society, loss of guidance, loss of solace, loss of protection, profound emotional loss, and profound psychological loss.

**1157.** As a direct and proximate result of the foregoing, decedent, Marjorie Vital's wrongful death beneficiaries incurred or have been caused to incur and pay large and various

expenses for medical treatment, hospital care and to incur various funeral, burial and estate and administration expenses for which Plaintiff is entitled to compensation in this proceeding.

**1158.** Kristen Behrens, Esquire as Administratrix of the Estate of Marjorie Vital brings this action by virtue of the Wrongful Death Act, 42 Pa.C.S.A. § 8301, and Pa.R.C.P. 2202, and claims all benefits and recoverable damages under the Wrongful Death Act on behalf of all other persons entitled to recover under law.

WHEREFORE, Plaintiff demands that judgment be entered in favor of the wrongful death beneficiaries and against Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXLI – SURVIVAL ACT**  
**KRISTEN BEHRENS, ESQUIRE as Administratrix of the ESTATE OF MARJORIE**  
**VITAL v. ALL DEFENDANTS**

**1159.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1160.** Plaintiff claims on behalf of the Estate of Marjorie Vital all damages suffered by the Estate by reason of the death of Marjorie Vital, including without limiting the generality of the following: the severe injuries to Marjorie Vital, which resulted in her death; the anxiety, horror and fear of impending and certain death, mental disturbance, pain, suffering and other intangible losses which Marjorie Vital suffered prior to her death; the loss of future earning capacity suffered by Marjorie Vital from the date of death until the time in the future she would have lived had she not died as a result of the injuries sustained by reason of the strict liability, recklessness and outrageous conduct of Defendants.

**1161.** Plaintiff brings this action on behalf of the Estate of Marjorie Vital, by virtue of the Survival Act, 42 Pa.C.S.A. § 8302, and claims all benefits of the Survival Act on behalf of Marjorie Vital's Estate, and other persons entitled to recover under law.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXLII – LOSS OF CONSORTIUM**  
**THE CONSORTIUM PLAINTIFFS v. ALL DEFENDANTS**

**1162.** Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

**1163.** The Consortium Plaintiffs, Abdul-Wahab Abdulhamid and Maryam Adam, h/w; Abraham Abebe and Turufat Yilma Girma, h/w; Mohamed Ahmed and Randa Al-Arasi, h/w; Maria de Fatima Alves and Manuel Miguel Alves, h/w; Sied Bayan and Nadia Yousef, h/w; Rosita Bonifacio; Lee Chapman; Jose Costa Cotelos and Dorinda Suarez Chans, h/w; Katarzyna Dabrowska and Roy Smith, h/w; Petra Doulova and Leroy Augustus, h/w; Bellal El-Guenuni; Mouna El-Ogbani and Youssef Khalloud, h/w; William Thomson and Mary Hanley, h/w; Eduardo Ignacio and Erlinda Ignacio, h/w; Wesley Ignacio and Madylyn Ignacio, h/w; Miran Lovsin and Duzana Lovsin, h/w; Hanife Macit and Sener Macit, h/w; Mohammed Rasoul and Munira Mahmud, h/w; Makrem Harzi and Rawda Said, h/w; Shantilal Patel and Kiran Patel, h/w; Adriana Ramirez; Paulos Tekle and Genet Shawo, h/w; Elizabeth Sobieszczak and Michael Sobieszczak, h/w; Tesfaye Yohannes; Carmen Vieiro and Jose Vieiro, h/w; Hiwot Dagnachew and Wintom Temesgen, h/w; Hime Gashaw and Richard Fletcher, h/w, are and were at all relevant times spouses and/or husband and/or wife of Survivors who suffered injuries and damages and as such, are entitled to the society, companionship, and services of each other.



1164. By reason of Defendants' strict products liability, outrageously willful and wanton conduct, and punitive conduct, the Consortium Plaintiffs have suffered the loss of consortium and have been deprived of their respective spouse's love, companionship, comfort, affection, society, moral guidance, intellectual strength and physical assistance, and the loss of the assistance and earnings of their respective spouses.

WHEREFORE, the Consortium Plaintiffs demand judgment in their favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**COUNT CXLIII – PUNITIVE DAMAGES**  
**ALL PLAINTIFFS V. ALL DEFENDANTS**

1165. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs the same as though fully set forth herein.

1166. The Defendants' conduct, as averred herein, was reckless, willful, wanton, and outrageous.

1167. The Defendants, through the conduct averred herein, acted with a reckless indifference to the rights, lives, and safety of the residents and guests of the Grenfell Tower, including Plaintiffs.

1168. As a result of the conduct of Defendants, as averred herein, punitive damages are warranted.

WHEREFORE, Plaintiff demands judgment in her favor and against all Defendants in an amount in excess of the jurisdictional threshold in compensatory damages, punitive damages, delay damages, interest and allowable costs of suit and brings this action to recover same.

**SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.**

BY: 

ROBERT J. MONGELUZZI  
JEFFREY P. GOODMAN  
SAMUEL B. DORDICK

**DiCELLO LEVITT GUZTLER LLC**


BY: /s/ Mark A. DiCello

MARK A. DiCELLO

ADAM J. LEVITT (to apply for admission *Pro Hac Vice*)

### VERIFICATION

The averments or denials of fact contained in the foregoing are true based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are inconsistent in fact, signer has been unable, after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This Verification is made subject to the penalties of the 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.



JEFFREY P. GOODMAN

Date: June 6, 2019

VERIFICATION

The averments or denials of fact contained in the foregoing document are true based upon the signer's personal knowledge or information and belief. If the foregoing contains averments which are inconsistent in fact, signer has been unable, after reasonable investigation, to ascertain which of the inconsistent averments are true, but signer has knowledge or information sufficient to form a belief that one of them is true. This Verification is made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

DATE: June 6, 2019



KRISTEN L. BEHRENS